



FY 2019 Annual Action Plan

Executive Summary

AP-05 Executive Summary - 91.200(c), 91.220(b)

1. Introduction

The City's central long-term community development goal is to focus resources on community needs, particularly the comprehensive revitalization of distressed areas and areas with high levels of poverty. These goals address affordable housing, homelessness, community development and non-homeless special needs. The City of Tucson's FY 2019 Annual Action Plan, Year Four of the FY 2016-2020 Consolidated Plan, details the goals and funding priorities to continue the City's efforts in improving the quality of life for Tucson's low- and moderate-income residents through enhancing the physical environment as well as providing direct benefits that will result in expanded housing opportunities and improved quality of life.

Subject to HUD's approval of the FY 2019 Annual Action Plan, the City of Tucson will receive the following federal funds for Program Year 4 (July 1, 2018 through June 30, 2019):

Community Development Block Grant (CDBG) funds - \$5,518,866. The primary objective of the CDBG program is the development of viable urban communities through the provision of improved living environments, expansion of economic opportunity and decent housing. Funds are intended to serve low and moderate income residents and areas.

Home Investments Partnerships (HOME) funds - \$3,508,146. (City/County Consortium Amount). The HOME program is dedicated to increasing the availability as well as the access to affordable housing for low income households.

Emergency Solutions Grant (ESG) funds - \$448,878. The purpose of the ESG program is to assist individuals and families regain housing (temporary and permanent) after experiencing a housing crisis or homelessness

Housing Opportunities for People with AIDS (HOPWA) funds - \$589,416. HOPWA funds may be used for a wide range of housing, social services, program planning, and development costs for the benefit of individuals living with HIV/AIDS and their families.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

In general, HUD resources must be used to benefit low and moderate income (low-mod) households and neighborhoods. To address infrastructure, facility, housing and services needs using HUD funding, the City of Tucson established goals and objectives in the 2015-2019 Consolidated Plan to address the following needs:

Affordable Rental Housing, Affordable Owner Housing, Homelessness, Human Services, including employment and training supports, Economic Development, Neighborhood Revitalization, Public Facilities and Infrastructure; and Special Needs Populations.

These objectives require specific actions that expand and preserve affordable housing, revitalize low and moderate income neighborhoods, and promote fair housing choices. For example, the City intends to fund the Housing Rehabilitation Collaborative through a Request for Proposal process for housing rehabilitation services to low/moderate income home owners. The outcome will maintain affordable owner housing and neighborhood revitalization. Also, the City will continue to make available HOME funds to applicants seeking Low-income Housing Tax Credits (LIHTC) from the State of Arizona Department of Housing (ADOH) for other Affordably rental housing projects. The outcome of these projects will result in increased affordable housing units through single and multi-family new construction. In addition, human/public service projects will be funded with CDBG to address homelessness and crisis assistance and prevention. Furthermore, the City will expend carry forward funds for the replacement of emergency response vehicles that will serve low and moderate income areas, as not all vehicles were purchased in FY2017.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The performance of programs and systems are evaluated annually in the City's Consolidated Annual Performance and Evaluation Report (CAPER) which provides details for the projects and programs completed in the past year. The CAPER completed in September of 2017 evaluated Tucson's performance for FY 2017 which was Year Two of the FY 2016-2020 Consolidated Plan. City of Tucson CAPERs for previous years are available for viewing at <https://www.tucsonaz.gov/hcd/reports>.

The City of Tucson evaluates its past performance every year as part of the Consolidated Annual Performance and Evaluation Report (CAPER) as required by HUD. The FY2017 CAPER was completed in September of 2017 and evaluated the City of Tucson's performance for FY2017 (July 1, 2016 to June 30, 2017, Year 2 of the FY 2016 FY 2020 Consolidated Plan). The past performance of the City of Tucson is reflected in the CAPER. This information indicates performance levels for many categories exceeded the goals established in the FY 2016-FY 2020 City of Tucson Consolidated Plan.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

On February 26, 2018, March 5, 2018, and May 7, 2018, the City of Tucson published legal advertisements in the local newspaper, to provide public notice of entitlement funding and the planning process, and to solicit public comment and stakeholder participation in the Annual Action Plan Public Meeting (Attachment 1). On March 8, 2018, City of Tucson and Pima County staff made a joint presentation to the Tucson-Pima Coalition to end Homelessness General Council and announced the date, time, and location of the Annual Action Plan Public Meeting. The 30-day public comment periods for the draft FY 2019 Annual Action Plan were March 12, 2018 to April 11, 2018 and May 11, 2018 to June 10, 2018. Public meetings were held March 13, 2018, and May 30, 2018. A public hearing before the City of Tucson Mayor and Council was held June 19, 2018. Comments regarding the draft Annual Action Plan were accepted during the public comment periods, the public meetings, and the public hearing. The City also posted the public notices, the meeting notices, and the draft plan on the City's web site and on social media and sent an email outlining this information to over 400 email addresses comprised of various neighborhood, community, and social service agency representatives.

Feedback received from the public process was posted on the HCD web site.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

A total of 28 persons attended and eight spoke at the public meeting March 13, 2018. A total of 14 persons attended and five spoke at the public meeting May 30, 2018. A summary of the public meetings is provided as Attachment 2.

At the March 13, 2018 public meeting the speakers' comments noted low income homeowners have unmet needs, the importance of serving the most vulnerable homeowners in the community, funding levels, leveraging funding, restrictions on funding, changes to the Housing Rehabilitation Collaborative (HRC), lack of consultation with service delivery agencies, HCD management staff not listening to public comments, the need for age-friendly communities, needs being greater than what can be done, food deserts, lack of transportation and poor economic development, 80% of healthcare costs related to poor housing and accessibility to food.

At the May 30, 2018 public meeting the speakers' comments noted need for assistance for elderly low income owners of single wide trailers, low demand housing for homeless persons, street outreach services, and housing and services for persons coming out of jail and prison, affordable student housing, retaining owner occupied housing through residential rehabilitation and home purchase assistance, sidewalks and ramps in neighborhoods, support for transitional housing, ensuring that housing providers provide services for homeless and mentally challenged individuals, affordable senior living complexes, and that rental housing should be placed in larger empty acreage near bus stops rather than in neighborhoods.

The City of Tucson received six written comments at the public meetings and one emailed comment. The written comments addressed partnering with HUD to beautify and clean up Barrio Hollywood, removing abandoned vehicles, vacant houses, safety, street clean ups, public gardens, and resources for the elderly to improve their homes, and replacement assistance for elderly low income owners of single wide trailers.

A summary of the public comments is provided as Attachment 3.

On behalf of the City of Tucson – Pima County HOME Consortium, Pima County conducted a survey of Housing Counseling Agencies from March 2, 2018 to March 28, 2018, regarding the Consortium's Down Payment Assistance Program. Results of the survey are provided as Attachment 3b.

Mayor and Council held a public hearing June 19, 2018. There were no speakers and no comments were submitted.

6. Summary of comments or views not accepted and the reasons for not accepting them

All comments were accepted.

7. Summary

The City of Tucson conducted two public comment periods, two public meetings, and one public hearing with notice provided in English and Spanish in the local newspaper, on social media, and via a mass emails to local public service organizations and neighborhood groups. Information on the Annual Action Plan and the planning process was provided at the public meetings. Spanish language translators were

available at the public meetings and the public hearing. Following the Annual Action Plan presentation City of Tucson staff responded to comments and questions from those in attendance. A total of seven written/emailed comments were received during the public comment periods and the public hearing.

PR-05 Lead & Responsible Agencies - 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role		Name	Department/Agency
CDBG Administrator		TUCSON	Housing and Community Development Department
HOPWA Administrator		TUCSON	Housing and Community Development Department
HOME Administrator		TUCSON	Housing and Community Development Department
ESG Administrator		TUCSON	Housing and Community Development Department

Table 1 – Responsible Agencies

Narrative

In 1992 the City of Tucson and Pima County formed a HOME consortium and with this designation are required to coordinate on consolidated planning and reporting activities. The City of Tucson Housing and Community Development Department (HCD) is the lead agency for the development of the Consolidated Plan and with respect to the implementation of the annual HOME Investment Partnership Program (HOME). The City of Tucson and Pima County Consolidated Plan is carried out through individual Annual Action Plans, which provide a concise summary of the actions, activities, and the specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan.

Consolidated Plan Public Contact Information

City of Tucson

Housing and Community Development Department

310 N. Commerce Park Loop

P.O. Box 27210

Tucson, AZ 85726-7210

(520) 791-4171 Fax: (520) 791-5407

website: www.tucsonaz.gov/housing-and-community-development

email: HCDAdmin@tucsonaz.gov

AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

During the development of the 2015 - 2019 Consolidated Plan, the City of Tucson and Pima County jointly held 14 Consolidated Plan Forums. Members of the public were invited to attend and participate in forum discussions. The forums were attended by 106 individuals representing 48 nonprofit organizations and units of government, 14 members of the public, and 16 private-sector representatives. City staff also attended eight neighborhood association meetings to present the consolidated plan process. 110 citizens attended these meetings and 70 of them participated in a survey. Consultation and citizen participation comments from the forums and the neighborhood associations were collated with analyzed data to identify priorities.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).

In the process of developing the Consolidated Plan, the City of Tucson and Pima County provide opportunities (i.e. public meetings and forums) for representatives of a variety of agencies to gather to discuss issues, problems and solutions. These meetings act as an impetus to improve understanding and coordination. Numerous groups have ongoing discussions, including those that represent poverty-level households, elderly people, and people with special needs and disabilities. The City and County remain involved in these discussions and some are sponsored or facilitated by the City and/or County.

The City and County specifically held a forum focused on Healthy Communities, which included a public health discussion by the Pima County Health Department and the possible methods for enhancing coordination of services among and between housing providers and health service agencies.

In addition, the City and County sponsor regular training opportunities during which stakeholder agencies gather to discuss and coordinate activities around program-specific and generic topics. The City and County are also working more closely with the Pima County Health Department to coordinate health and housing activities. One example is the assessment of emergency and transitional shelters that was followed by coordinated funding to enhance the environment in these facilities.

In the early part of 2016, the City of Tucson also updated its Human Services Plan which sets priorities for funding for Public/Human Service projects which utilized CDBG, ESG, and City General Funds. Citizens, government staff and non-profit agencies attended a meeting to prioritize the urgent needs of the community. Two additional meetings were held with government representatives and citizens to discuss the results of the first meeting plus an invitation was sent to over 500 emails comprised of

government representative, citizens and agencies requesting that they participate in an online survey regarding Human Services priorities. Over 120 people completed the survey. A final meeting was held to rank the priorities. A Human Services plan was drafted outlining this process and the results.

On April 5, 2016, the Human Services Plan was presented to Mayor and Council for review. At the meeting, Mayor and Council passed by a roll call vote of 7 to 0, to adopt Resolution No. 22550, with an amendment to the Human Services Plan that would retain the current funding for the first year of the Plan, and implement the new funding for the remainder of the Plan. This included postponing implementation of this plan until FY 2018. A copy of this Human Service Plan is attached as Appendix C.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The City of Tucson and Pima County work collaboratively with the Tucson Pima Collaboration to End Homelessness (TPCH). TPCH is the Continuum of Care Regional Committee on Homelessness, a planning entity made up of local stakeholders convened for the purpose of ensuring that homeless planning is coordinated across municipalities and agencies. The Continuum of Care is the methodology followed by organizations utilizing HUD funding to address the needs of individuals and families experiencing homelessness. TPCH has included health care in their strategic plan to take advantage of potential partnerships among federal agencies and identified an increasing need to fund mental health diagnosis and permanent supported housing for domestic abuse survivors.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The City of Tucson and Pima County participate in the TPCH Emergency Solutions and Performance Evaluation and Monitoring working groups. The Emergency Solutions working group provides an avenue for the City of Tucson and Pima County to obtain input into the distribution of ESG funds, and members of the working group assist with the City of Tucson and Pima County application review when no conflict of interest exists. The Performance Evaluation and Monitoring working group establishes performance standards, establishes at least three performance measures for each contract, and reviews quarterly reports to evaluate outputs and outcomes. The HMIS system is administered by Pima County. The City of Tucson allocates a portion of their ESG funds to support Pima County's administration of HMIS.

On February 9, 2017 the City distributed a survey questions to members of the local Continuum of Care requesting comments regarding the following related to homelessness:

- Prioritizing the Consolidated Plan Goals and Priorities for FY 2018;

- List and describe emerging needs that should be addressed in FY 2018;
- Provide examples of best practices for measuring effectiveness of homeless services programs; and
- Give examples of agency surveys used to measure client satisfaction.

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	City of Tucson
	Agency/Group/Organization Type	Services-Children Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency groups and organizations typically include entities seeking funding from CDBG and ESG. Most if not all participated during available public meetings or technical assistance workshops. The City is the lead member of the Housing Rehab Collaborative. HRC meetings are scheduled six times per year. Members discuss barriers and solutions to service delivery issues.
2	Agency/Group/Organization	PIMA COUNTY
	Agency/Group/Organization Type	Housing Services - Housing Other government - Local Grantee Department

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Pima County, along with City of Tucson coordinated 14 Consolidated Plan Forums. This government department helped facilitate the forums, participated actively and then assisted in analyzing the data to determine the priorities. Conferred regarding preferred underlying assumptions for administration of the HOME program.
3	Agency/Group/Organization	Pima County Health Department
	Agency/Group/Organization Type	Health Agency Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in Consolidated Plan Forums. COT participated on Pima County Health Department Pay for Success Steering Committee. The Health Department assisted in discussions regarding health hazards in homes and among special populations including people living in poverty.

4	Agency/Group/Organization	COMMUNITY HOME REPAIR PROJECTS
	Agency/Group/Organization Type	Housing Services - Housing Services-Elderly Persons Services-Persons with Disabilities Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in Consolidated Plan Forums, and Annual Action Plan public meetings. CHRPA is member of the Housing Rehab Collaborative (HRC). HRC meetings are scheduled six times per year. Members discuss barriers and solutions to service delivery issues. Conferred with COT to revise the Home Access Program (HAP). CHRPA provides emergency and non-emergency home repair for their clients including senior and persons with disabilities.

5	Agency/Group/Organization	DIRECT CENTER FOR INDEPENDENCE
	Agency/Group/Organization Type	Housing Services - Housing Services-Elderly Persons Services-Persons with Disabilities Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in Consolidated Plan Forums, and Annual Action Plan public meetings. DIRECT is member of the Housing Rehab Collaborative (HRC). HRC meetings are scheduled six times per year. Members discuss barriers and solutions to service delivery issues. Conferred with COT to revise the Home Access Program (HAP). DIRECT provides accessibility improvements for clients including senior and persons with disabilities.
6	Agency/Group/Organization	Alzheimer's Disease & Related of Southern Arizona
	Agency/Group/Organization Type	Housing Services-Elderly Persons Services-Persons with Disabilities Services-Health Services-Education

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in the public forums/ ADRSA provides services to persons experiencing Alzheimer's disease and other forms of dementia.
7	Agency/Group/Organization	CHICANOS POR LA CAUSA
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-homeless Services-Health Services-Education Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Economic Development Anti-poverty Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in Consolidated Plan Forums. Conferred with CLPC regarding the Oracle Choice Neighborhood Initiative/Oracle Area and the HUD EnVision Demonstration project. CLPC provides housing and health, services and economic development.
8	Agency/Group/Organization	COMMUNITY FOOD BANK
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-homeless Services-Health Services-Education Regional organization
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in Consolidated Plan Forums, and Annual Action Plan public meetings. Regional organization that manages the area food bank and provides education on nutrition and food production.

9	Agency/Group/Organization	Esperanza en Escalante
	Agency/Group/Organization Type	Housing Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homelessness Needs - Veterans Non-Homeless Special Needs Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in Consolidated Plan Forums. Conferred with COT regarding use of HOME and project based vouchers related to housing homeless veterans. EEE has inquired about HOME for gap funding in LIHTC applications. EEE provides assistance to veterans including housing, case management and other services.
10	Agency/Group/Organization	HABITAT FOR HUMANITY
	Agency/Group/Organization Type	Housing Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-Education Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy Lead-based Paint Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in public meetings, and Annual Action Plan public meetings. Conferred with COT regarding use of HOME for homeownership development down payment assistance. Habitat provides repairs to existing dwellings and new construction of homes for low income families.
11	Agency/Group/Organization	PIMA COUNCIL ON AGING
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in Consolidated Plan Forums, and Annual Action Plan public meetings. Conferred with COT regarding achieving AARP Age Friendly Community Designation. Pima Council on Aging provides services and advocacy for independence in the lives of Pima County older adults and their families.

12	Agency/Group/Organization	PRIMAVERA FOUNDATION
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Publicly Funded Institution/System of Care
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in Consolidated Plan Forums. Conferred with COT within the Tucson/Pima County Coalition to End Homelessness (TPCH) ESG subcommittee. The Primavera Foundation provides pathways out of poverty through safe, affordable housing, workforce development and neighborhood revitalization.

13	Agency/Group/Organization	SOUTHERN ARIZONA AIDS FOUNDATION, INC.
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-homeless Services-Health Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy HOPWA Strategy Market Analysis Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in Consolidated Plan Forums. Have discussed leasing COT EI Portal units for SAAFs state-funded homeless program. Southern Arizona Aids Foundation provides case management and ancillary support services for people living with HIV, AIDS and their families.
14	Agency/Group/Organization	CODAC BEHAVIORAL HEALTH SERVICES
	Agency/Group/Organization Type	Services-Health Health Agency

	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in forums. CODAC provides primary care and general wellness for those experiencing mental illness, substance use disorder and/or trauma.
15	Agency/Group/Organization	OLD PUEBLO COMMUNITY SERVICES
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-homeless Services-Health Services-Education Health Agency
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in Consolidated Plan Forums, and Annual Action Plan public meetings. Conferred related to path for re-entry population leaving transitional housing.

Identify any Agency Types not consulted and provide rationale for not consulting

During the Consolidated Plan development, there were no specific agency types that were not contacted. Any agency that responded was able to participate in the process.

For the Annual Action Plan, any agency or citizen that requested consultation on the direction and rational of the plan, were responded to. More detail is provided under AP-12 of this plan.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Tucson Pima Collaboration to End Homelessness	The City of Tucson is one member of the Continuum of Care, which is operated by the Tucson Pima Collaboration to End Homelessness. All Consolidated Plan goals related to homelessness overlap the goals of the Continuum of Care.
City of Tucson General Plan	City of Tucson	The City's General Plan. Plan Tucson, supports a framework of local policies that can significantly and positively impact housing and other needs of LMI residents and neighborhoods. The City's expectations are focused on sustainability, reserving land for economic development, and revitalization. Plan Tucson includes 4 focus areas including social, economic, natural and built environments. Many of the Plan Tucson goals and policies are inter-related with Consolidated Plan goals and policies.
City of Tucson Housing Community Dev. PHA Plan	City of Tucson Housing & Community Dev. Dept.	HCD is both the Public Housing Authority and the Community Planning and Development Agency. The Community Planning Division, which is responsible for the development and implementation of the Consolidated Plan works closely with the PHA division in a joint effort to address the housing needs of the community.
Oracle Area	Rose Center for Public Leadership in Land Use	The Fellowship Program provided recommendations to improve community engagement, corridor identity, and pedestrian safety in the Oracle Area.
Community Based Crime Reduction Initiative	Arizona State University School of Social Work	This initiative will support research, planning, and implementation activities to address social drivers of crime within an area that is largely coincident with the Oracle Area.

Table 3 – Other local / regional / federal planning efforts

Narrative

Cross-Departmental Services Coordination: If feasible, the PHA is coordinating with other City Departments that provide services to low-income residents. The goal is develop a system for streamlining the eligibility processes for City assistance, collect accurate demographic information related to low-income resident needs, and provide existing City services comprehensively and efficiently. The cross-departmental team is evaluating a one-stop program eligibility process administered by the PHA that would allow low-income residents to sign up annually for multiple services offered by the City including discounts for public transportation.

Community Planning Efforts focused on seniors: On September 7, 2016 Mayor and Council adopted Resolution #22621 related to Tucson's Designation as a World Health Organization (WHO) Age Friendly City. The PHA participates in the planning process that is focused on the needs of seniors. This effort will result in a plan that incorporates benchmarks that can be used to set goals for Tucson's AARP Plan and to measure progress in meeting those goals. The livability issues listed below were identified by a national AARP survey and are consistent with the goals of the PHA:

1. Easy access to health care and supportive services
2. More housing options, affordable housing including accessory dwelling units, and active/assisted living communities
3. Accessible and affordable public transportation
4. Increased police presence and communication between police and community residents
5. Housing located close to stores, transportation, health care facilities and other community services

AARP has developed a “Livability Index” that assesses seven broad categories of community livability: housing, neighborhood, transportation, environment, health, engagement, and opportunity. Future housing RFP’s issued by the City will require the applicant to identify which livability category their proposal serves, and will also incorporate the AARP Livability Index into assessment of proposals.

AP-12 Participation - 91.401, 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The City of Tucson began the citizen participation and consultation process by placing a public notice advertisement for the March 13, 2018 public meeting and the 30-day public comment period in the local newspaper (the Arizona Daily Star) on February 26, 2018, and March 5, 2018. The public comment period ran from March 12, 2018 to April 11, 2018. The City posted public notice for the 30 day public comment period and the public meeting on the City's website and on social media. The City also sent an email outlining this information along with a request for comments to over 400 email addresses comprised of neighborhood association members, government representatives, and nonprofit/agency representatives.

The above process was repeated when the entitlement allocations were announced with a second public notice period from May 11, 2018 to June 10, 2018, and a second public meeting May 30, 2018.

The Mayor and Council held a public hearing June 19, 2018. There were no speakers and no comments recieved. Mayor and Council approved the Annual Action Plan with adoption of Resolution No. 22887, provided as Attachment 5.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>The first public meeting was on March 13, 2018. 28 persons attended. A total of nine comments were received; eight spoken and an one written. The second public meeting was May 30, 2018. 14 persons attended. A total of 12 comments were received; seven spoken and an five written. One additional comment was received via email.</p>	<p>Summary of comments can be located in Attachment 3.</p>	n/a	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Newspaper Ad	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>30 day comment periods for the draft FY 2019 Annual Action Plan were March 12, 2018 to April 11, 2018, and May 11, 2018 to June 10, 2018.</p>	<p>Summary of comments can be located in Attachment 3</p>	n/a	
3	Public Hearing	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>June 19, 2018 Mayor and Council Public Hearing.</p>	<p>There were no speakers and no comments received.</p>	n/a	

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

Introduction

The City of Tucson Department of Housing and Community Development funds numerous nonprofit organizations and may fund other City of Tucson departments. For most programs organizations and activities are selected annually through a competitive request for proposals process.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	5,518,866	50,000	500,000	6,068,866	4,571,559	Community Development Block Grant (CDBG) funds may be used for a variety of activities that meet the needs of low and moderate income residents and communities. Eligible activities are public services, economic development, and capital improvements such as infrastructure, facilities, and housing. Each activity must meet a HUD objective.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	3,508,146	500,000	0	4,008,146	1,413,474	HOME Investment Partnership Program (HOME) resources may be used to benefit low and moderate income owners and low income renters through housing rehabilitation, acquisition, and new construction activities or by providing tenant-based rental assistance. The City and County will set aside CHDO project funding and solicit CHDO applications, certifying projects and CHDO eligibility on a per project basis. The County will divide HOME funds between rental and home owner programs and the City intends to set aside HOME project funds giving first priority to applicants seeking Low-income Housing Tax Credit (LIHTC) Funds from the State of Arizona Department of Housing. The 2015 HOME program Procedures Manual provides detail on the City and County HOME application process: www.tucsonaz.gov/hcd/affordable-housing-opportunities

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	589,416	0	0	589,416	326,590	The Housing Opportunities for Persons with HIV/AIDS and their Families (HOPWA) program funds housing assistance and support services for low-income persons with HIV/AIDS and their families. HOPWA funds are administered by the Southern Arizona AIDS Foundation.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	448,878	0	0	448,878	789,579	The Emergency Solutions Grant (ESG) program provides funding to: 1) engage homeless individuals and families living on the street; 2) improve the number and quality of emergency shelters; 3) help operate shelters; 4) provide essential services to shelter residents; 5) rapidly re-house homeless individuals and families; and 6) prevent families and individuals from becoming homeless. Activities are selected in cooperation with the Tucson Pima Collaboration to End Homelessness.
Section 108	public - federal	Economic Development Public Improvements	8,000,000	0	0	8,000,000	0	The City of Tucson Office of Economic Initiatives previously facilitated HUD CDBG Section 108 loan transactions. City of Tucson funding for this program has expired and will not be renewed.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - state	Acquisition Conversion and rehab for transitional housing Homebuyer assistance Housing Multifamily rental new construction Multifamily rental rehab	0	0	0	0	0	The National Housing Trust Fund (HTF) is a permanent federal fund authorized by the Housing and Economic Recovery Act of 2008. It is intended to provide grants to States to increase and preserve the supply of rental housing for extremely low and very low income families, including homeless families, and to increase home ownership for extremely low and very low income families. The City plans to leverage these resources. No Funding for Year 4.

Table 2 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The City of Tucson and Pima County formed a HOME consortium in 1992 with the City of Tucson as the lead agency. Of the HOME funding provided, 10% is set aside for administration and 15% is set aside for Community Housing Development Organizations (CHDO) equating to \$373,197 for the City of Tucson and \$153,025 for Pima County. The City of Tucson will allocate \$1,000,000 to rental rehabilitation and \$551,669.50 to rental development, with a priority given to applicants seeking Low-income Housing Tax Credit (LIHTC) Funds from the State of Arizona Department of Housing. The City will set aside an additional \$300,000 for Homeownership down payment assistance.

Pima County will allocate \$200,000 of their funding for Homeownership down payment assistance, \$180,000 for home ownership and

preservation, \$50,000 for Tenant Based Rental Assistance (TBRA) and \$349,440 for rental development. Both programs will provide 25% HOME Program match as required. The City of Tucson will satisfy their match requirement using general funds, contributions from the City of Tucson Housing Trust Fund, non-federal sources of cash invested in projects and the value of savings on below market interest rate loans. HOME funds will also be leveraged with Low Income Housing Tax Credit (LIHTC) Investment Rental Projects. Pima County will provide match through Pima County G.O. Bonds for Affordable Housing and matching funds for Down Payment Assistance through Federal Home Loan Bank (FHLB) grant.

City of Tucson: ESG match requirement is satisfied with a one-to-one award value from allowable costs incurred by the sub-grantee of non-Federal funds, cash donations from non-federal third parties and/or the value of a third party in-kind contributions.

General Fund: The projected city budget recommits approximately \$1,464,910 from the city's General Fund for Human services programs. Funds are granted to agencies through a competitive Request for Proposal process. Competing agencies must provide support services to low income households. Grant contracts can be renewed on a year to year basis not to exceed five years.

Housing Choice Voucher: The Public Housing Authority administers the Section 8 Housing Choice Voucher program which provides rent subsidies to approximately 5,654 households within the City of Tucson and Pima County including 877 administered for Pima County, 636 HUD VASH vouchers for Veterans, 150 Family Unification Vouchers, and 46 Moderate Rehabilitation program units. The City anticipates \$32 million in Housing Choice Voucher (Section 8) funding for FY 19.

The City of Tucson previously qualified for the Section 108 loan guarantee assistance program for \$20 million dollars in guaranteed loan funds. These funds can be used to for individual projects that will have positive economic and community development benefits, including job creation. The City received HUD approval for an \$8 million hotel project. Construction of this hotel began in 2016 and was completed in 2017. The balance of the loan pool expired in 2017. There we be no new projects for fiscal year 2019.

Public Housing: The Public Housing Authority administers the public housing program of 1,505 scattered site units. For FY 2019, federal funds of approximately \$11 million will be allocated to administer this program. The PHA will also receive approximately \$1.3 million in Capital Funds to help cover the costs of maintaining these dwellings.

Additional non-entitlement funds anticipated for Program Year 4:

Continuum of Care funding - \$2,296,289

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The City of Tucson has available multiple parcels of land that may be developed to provide housing and facilities for the benefit of low and moderate income people and neighborhoods. As available, an Request for Proposals process will occur that will provide opportunities for private and nonprofit developers to participate in the development of these parcels.

Discussion

Analysis of PHA portfolio and options: The City of Tucson is in the process of completing an analysis of the Public Housing portfolio to identify strategies for long-term viability. Issues under evaluation include: 1) funding sources; 2) financing mechanisms; 3) rent structures; 4) capital and structural improvements; 5) property mix and geographic distribution; 6) operations costs, energy costs and management efficiencies; 7) neighborhood context and revitalization initiatives; 8) coordination of City services for low-income residents; and 9) maintaining the one-for-one replacement of any units that are removed from the public housing portfolio.

Oracle Choice Neighborhoods and Related Initiatives: In 2016 and 2017 the City of Tucson applied for Choice Neighborhoods Planning and Action Grants from the U.S. Department of Housing and Urban Development (HUD). The Choice Neighborhoods application, known as the Oracle Choice Neighborhoods Initiative (OCNI) encompasses 2.6 square miles and includes Tucson House, a 408 unit, seventeen-story public housing facility serving elderly and disabled persons that represents 27% of the local PHA public housing portfolio. A physical needs assessment for Tucson House prepared in support of the OCNI resulted in a “severely distressed” designation, due to the antiquated physical systems in the building. Tucson House is located in a high-stress neighborhood with an adopted revitalization area plan, the Oracle Area Revitalization Project (OARP).

The applications were not selected for funding. The City will evaluate future Choice Neighborhood grants if they become available and will continue to pursue other avenues to address the needs identified in the Choice Neighborhoods application to transform and revitalize Tucson House and the surrounding neighborhood.

In October 2017, the Arizona State University School of Social Work was awarded funding for a Community Based Crime Reduction initiative for the Oracle Area. This initiative will support research, planning, and implementation activities to address social drivers of crime within an area that is largely coincident with the OARP and OCNI area. The Rose Center for Public Leadership in Land Use, a program of the National League of Cities (NLC) in partnership with the Urban Land Institute (ULI) chose this same area for its 2018 Fellowship Program. The Fellowship Program provided recommendations to improve community engagement, corridor identity, and pedestrian safety (approximately 2/3 of renters in the area do not have access to a car). The City of Tucson will allocate \$250,000 of CDBG funding for facilities

and infrastructure projects to further implementation of recommendations from both the Community Based Crime Reduction Initiative and the Rose Center Fellowship.

Energy Performance Contract: The PHA has done some preliminary evaluations and is considering an energy performance contract for the entire portfolio of public housing.

Rental Assistance Demonstration (RAD): The PHA is continuing to investigate additional options for making the needed improvements to Tucson House, including evaluating the possibility of a Rental Assistance Demonstration (RAD) conversion.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Rental Housing Development	2015	2019	Affordable Housing Non-Homeless Special Needs	TUCSON, AZ Citywide	Decent Affordable Rental Housing	HOME: \$2,927,331	Rental units constructed: 73 Household Housing Unit Rental units rehabilitated: 26 Household Housing Unit
2	Owner-occupied Housing Rehabilitation	2015	2019	Affordable Housing Non-Homeless Special Needs	TUCSON, AZ Citywide	Decent Affordable Owner Housing	CDBG: \$1,912,263 HOME: \$180,000	Homeowner Housing Rehabilitated: 150 Household Housing Unit
3	Home Purchase Assistance	2015	2019	Affordable Housing	TUCSON, AZ Citywide	Decent Affordable Owner Housing	HOME: \$300,000	Direct Financial Assistance to Homebuyers: 85 Households Assisted
5	Emergency Shelter	2015	2019	Homeless	TUCSON, AZ Citywide	Homelessness	CDBG: \$150,000 ESG: \$150,000	Homeless Person Overnight Shelter: 181 Persons Assisted
6	Rapid Rehousing/TBRA	2015	2019	Homeless	Citywide	Decent Affordable Rental Housing Homelessness	HOME: \$50,000 ESG: \$150,000	Tenant-based rental assistance / Rapid Rehousing: 73 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Homelessness Prevention	2015	2019	Homeless	TUCSON, AZ Citywide	Homelessness	ESG: \$50,000	Homelessness Prevention: 18 Persons Assisted
8	Outreach, Support Services and Case Management	2015	2019	Homeless	TUCSON, AZ Citywide	Homelessness	ESG: \$71,176	Other: 305 Other
9	Human and Public Services	2015	2019	Non-Housing Community Development	TUCSON, AZ Citywide	Human Services	CDBG: \$827,830	Public service activities other than Low/Moderate Income Housing Benefit: 1260 Persons Assisted
10	Facilities and Infrastructure	2015	2019	Non-Housing Community Development	TUCSON, AZ Citywide	Revitalization, Public Facilities & Infrastructure	CDBG: \$1,950,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 10500 Households Assisted
11	Assistance for people with HIV/AIDS	2015	2019	Non-Homeless Special Needs	TUCSON, AZ Citywide	Decent Affordable Rental Housing Special Needs Populations	HOPWA: \$548,157	Housing for People with HIV/AIDS added: 292 Household Housing Unit
12	Job Creation	2015	2019	Non-Housing Community Development	TUCSON, AZ Citywide	Economic Development	Section 108: \$8,000,000	Jobs created/retained: 160 Jobs

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
13	Administration	2015	2019	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	TUCSON, AZ Citywide	Decent Affordable Owner Housing Decent Affordable Rental Housing Economic Development Homelessness Human Services Revitalization, Public Facilities & Infrastructure Special Needs Populations	CDBG: \$1,103,773 HOPWA: \$41,259 HOME: \$263,111 ESG: \$27,702	Other: 14 Other

Table 3 – Goals Summary

Goal Descriptions

1	Goal Name	Rental Housing Development
	Goal Description	The City of Tucson anticipates creating 60 new rental units with \$1,051,669 in HOME funds for Low-Income Housing Tax Credit (LIHTC) applications, and rehabilitate 26 City-owned rental units with \$1,000,000 of HOME funds. Pima County anticipates creating 10 new rental units with \$349,440 in HOME funds. The City of Tucson and Pima County will set aside a combined \$526,223 of CHDO funding. This a high priority.

2	Goal Name	Owner-occupied Housing Rehabilitation
	Goal Description	<p>In FY 2019, the City of Tucson Home Owner Housing Rehabilitation program will be funded with \$1,912,263 CDBG. It is anticipated that 100 low-income home owners will be assisted with CDBG funds awarded based on an RFP issued in 2017. A new RFP will be issued for FY2019.</p> <p>In 2016, the City of Tucson was awarded \$2,900,000 for Lead Paint Hazard Control and Healthy Homes programs to remove lead hazards in approximately 180 homes. The Lead Paint Hazard Control program is now underway.</p> <p>General Funds of \$58,412 will be used to assist an estimated 200 low-income homeowners with emergency repairs through the Acute Emergency Home Repair Program.</p>
3	Goal Name	Home Purchase Assistance
	Goal Description	The City of Tucson will provide \$300,000 in home purchase assistance from the HOME program to assist 80 renter households become buyers. Pima County anticipates providing down payment assistance to 40 low-income households with \$200,000 in HOME funds. This is a low priority for the City and a high priority for Pima County.
5	Goal Name	Emergency Shelter
	Goal Description	The City of Tucson anticipates providing emergency shelter to 171 homeless people with ESG and CDBG - Old Pueblo Community Services. This is a high priority. A list of agencies and programs that will be funded for FY 2018 is attached as appendix A.
6	Goal Name	Rapid Rehousing/TBRA
	Goal Description	<p>The City of Tucson will 49 households with ESG funds. This includes General Funds. A list of agencies and programs that will be funded for FY 2018 is attached as appendix A</p> <p>Pima County will assist 17 households with Tenant Based Rental Assistance using HOME funds.</p>
7	Goal Name	Homelessness Prevention
	Goal Description	The City of Tucson anticipates assisting 18 people with homeless prevention using ESG. This is a high priority. A list of agencies and programs that will be funded for FY 2018 is attached as appendix A.

8	Goal Name	Outreach, Support Services and Case Management
	Goal Description	The City of Tucson anticipates assisting 305 homeless people with outreach, support services and case management with ESG and general funds. This is a high priority. A list of agencies and programs that will be funded for FY 2018 is attached as appendix A.
9	Goal Name	Human and Public Services
	Goal Description	The City of Tucson anticipates assisting 1,260 low to moderate income people with non-housing needs using part of the City's CDBG public services set-aside and general funds. These funds will help support 32 programs including the Community Food Bank, Inc., homeless youth, job program for deaf/blind persons, mobile meals for elderly, elderly companion program, bridge to college for youth program, family caregiver assistance, early childhood development, job program for homeless adults, child care assistance, financial assistance for homeless youth, crisis assistance for persons experiencing domestic violence, home repair for elderly homeowners, after school programs, parent support. A list of agencies and programs that will be funded for FY 2018 is attached as appendix A. The below numbers don't included General Fund outputs.
10	Goal Name	Facilities and Infrastructure
	Goal Description	The City of Tucson will fund facility improvements under the City/County Safe, Healthy and Green facilities program in the amount of \$200,000, Choice Neighborhoods in the amount of \$250,000, and will fund ADA improvements to public infrastructure in the amount of \$1,600,000.
11	Goal Name	Assistance for people with HIV/AIDS
	Goal Description	The City of Tucson anticipates assisting 292 people with AIDS providing a variety of services related to economic opportunities, education and employment. An estimated 20 households will receive tenant based rental assistance in the Address Homelessness category. An estimated 65 households will be provided with Transitional Short term facility assistance, 150 households with short-term rent, mortgage and utility assistance and 57 households will be provided with permanent housing placement services including move in deposits and housing prescreen assistance. This is a high priority.

12	Goal Name	Job Creation
	Goal Description	<p>The Section 108 loan of \$8 million was awarded to assist in funding the development of a hotel (AC Marriott). The remaining balance of \$12 million from the originally available \$20 million in loan funding has expired. Revisions to the loan program may limit application for funding under Section 108 in the future.</p> <p>The goal of 160 jobs created was established based on the \$8 million Section 108 loan. The AC Marriott hotel opened in the fall of 2017. Employment data will be posted as it becomes available. This program is administered by the City's Office of Economic Initiatives.</p>
13	Goal Name	Administration
	Goal Description	<p>The City of Tucson will spend the following on administration and planning activities:</p> <p>CDBG Administration is \$1,103,773 which includes planning activity funding of \$50,000 for the South 12th Avenue Corridor Plan and \$25,000 for Fair Housing Education activity.</p> <p>The other administrative costs will be allocated by Program funding as follows:</p> <p>City of Tucson HOME Administration - \$263,111 and Pima County is \$87,704 for a total HOME Administration of \$350,815</p> <p>City of Tucson HOPWA Administration - \$41,259</p> <p>City of Tucson ESG Administration - \$27,702</p> <p>Administration funding supports 13.50 FTE</p>

AP-35 Projects - 91.420, 91.220(d)

Introduction

The 5-year Consolidated Plan serves as a guide for annual investments of City and County project funds. For each of the five years covered by the Consolidated Plan, each local government is required to prepare an Annual Action Plan that correlates with the needs, priorities and goals specified in the Consolidated Plan, showing how annual entitlement funds will be allocated to meet the overall 5-year goals.

The 5-year goals and activities are divided into six priority needs: 1) Affordable Owner Housing; 2) Affordable Rental Housing; 3) Homelessness; 4) Human Services and Economic Opportunities; 5) Neighborhood Revitalization, Public Facilities, and Infrastructure; and Special Populations. The needs of non-homeless special populations are incorporated into each of the priority needs and goals where appropriate.

This section outlines projects and activities for fiscal year 2019 beginning July 1, 2018 and ending June 30, 2019.

Eligible projects may be directly implemented by the local government or administered through partner agencies and eligible contractors, designated as sub-recipients. All federal regulations apply to projects that are supported with HUD formula grant funding.

#	Project Name
1	ESG18 City of Tucson
2	2017-2020 City of Tucson AZH18F002 (COT)
3	2017-2020 Southern Arizona AIDS Foundation AZH18F002 (SAAF)
4	City of Tucson HOME Administration
5	City of Tucson and Pima County HOME CHDO Projects
6	City of Tucson HOME Rental Development
7	City of Tucson Home Ownership - Down Payment Assistance
8	Pima County HOME Administration
9	Pima County HOME Ownership (Development and Down Payment Assistance)
10	Pima County HOME Rental Development
11	Pima County HOME Tenant Based Rental Assistance (TBRA)
12	City of Tucson Rental - El Portal
13	CDBG Lead Grant Match
14	Human and Public Services
15	Owner Occupied Housing Rehabilitation
16	Public Facilities and Infrastructure

#	Project Name
17	CDBG Administration and Planning
18	CDBG Section 108
19	Pima County HOME Preservation

Table 4 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The City of Tucson applied the following in determining priorities and addressing underserved needs:

- 1) Changes in the housing market as described in the FY 2016-2020 City of Tucson/Pima County 5-year Consolidated Plan;
- 2) The documented past performance related to contracts, sub-recipients, programs and projects funded with the City's HUD entitlement grants in previous program years;
- 3) The funding levels for the City's HUD entitlement grants;
- 4) The opportunity to leverage local, State and Federal resources including City general funds, the Tucson Housing Trust Fund; the Tucson Public Housing Authority (PHA) rental units and preference programs and Section 8 vouchers; the State of Arizona Low-income Housing Tax Credit (LIHTC) funds and Lead based Paint Hazard Program funds and the funds allocated through the Continuum of Care/Shelter Plus Care process;
- 5) Achieving coordinated funding in the Consortium and administrative efficiencies in partnerships and contracts for housing and services with sub-recipients; and
- 6) Recognizing disparities in income, employment, housing and facilities which are indicators of urban stress, the City of Tucson adopted a Community Development Block Grant (CDBG) Target Area in program year 2013. This Target Area is based on information contained in a 2012 update to the City's Poverty and Urban Stress Report. The report documents disparities in urban stress based on factors such as income levels, education, housing issues and incidence of crime. Approximately 40% of the City of Tucson entitlement grant funding for FY 2019 will be committed to public facility and infrastructure improvement projects in the City of Tucson CDBG Target Area.

AP-38 Project Summary
Project Summary Information

1	Project Name	ESG18 City of Tucson
	Target Area	Citywide
	Goals Supported	Emergency Shelter Rapid Rehousing/TBRA Homelessness Prevention Outreach, Support Services and Case Management
	Needs Addressed	Homelessness
	Funding	CDBG: \$150,000 ESG: \$448,878
	Description	These funds will support ESG activities in the following categories: Emergency Shelter, Street Outreach, Homeless Prevention and Rapid Rehousing.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	These funds will support ESG activities in the following categories: Street Outreach – 850 homeless persons will be assisted Emergency Shelter – 81 homeless persons will be assisted Homeless Prevention 18 persons will be assisted Rapid Rehousing-67 households that are homeless will be assisted
	Location Description	Citywide
	Planned Activities	Programs include prevention, rapid rehousing, emergency services, and emergency shelters for homeless individuals and families. An additional 850 persons experiencing homelessness will be assisted through street outreach and case management.
2	Project Name	2017-2020 City of Tucson AZH18F002 (COT)
	Target Area	Citywide
	Goals Supported	Administration
	Needs Addressed	Homelessness
	Funding	HOPWA: \$41,259
	Description	This project is the City of Tucson administrative funds for the HOPWA program. This will provide partial funding for one FTE.
	Target Date	6/30/2019

	Estimate the number and type of families that will benefit from the proposed activities	This project is for HOPWA administration.
	Location Description	Citywide
	Planned Activities	This project is for grant administration of the HOPWA grant.
3	Project Name	2017-2020 Southern Arizona AIDS Foundation AZH18F002 (SAAF)
	Target Area	Citywide
	Goals Supported	Assistance for people with HIV/AIDS
	Needs Addressed	Special Needs Populations
	Funding	HOPWA: \$548,157
	Description	This project includes HOPWA project funds that are administered by the Southern Arizona Aids Foundation (SAAF) on behalf of the City of Tucson.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	292 persons that have HIV/AIDS or are part of a household where a member has HIV/AIDS.
	Location Description	Citywide
	Planned Activities	<p>Provide rental assistance for tenant based permanent housing units for 20 house holds</p> <p>Provide transitional/short term facility assistance to 65 households</p> <p>Provide short term rent, mortgage and utility assistance to 150 households</p> <p>Provide permanent housing placement services including move-in deposits and housing pre-screen assistance to 57 households.</p> <p>This service also provides case management and supportive services including transportation assistance, vital records to facilitate access to benefits and limited substance abuse related services to these same individuals and households.</p>
4	Project Name	City of Tucson HOME Administration
	Target Area	Citywide

	Goals Supported	Administration
	Needs Addressed	Decent Affordable Rental Housing Decent Affordable Owner Housing
	Funding	HOME: \$263,111
	Description	These funds support administration of the City HOME program. They will help support two FTE positions.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	n/a
	Location Description	
	Planned Activities	Administration of HOME program.
5	Project Name	City of Tucson and Pima County HOME CHDO Projects
	Target Area	Citywide
	Goals Supported	Rental Housing Development Owner-occupied Housing Rehabilitation
	Needs Addressed	Decent Affordable Rental Housing Decent Affordable Owner Housing
	Funding	HOME: \$526,222
	Description	HOME set asides for Community Housing Development Organization (CHDO). Joint commitment City and County.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	The City of Tucson and Pima County will assist one CHDO for six home units in a rental development that includes Low-income Housing Tax Credit (LIHTC) funding.
	Location Description	
	Planned Activities	The City of Tucson and Pima County to assist one CHDO this year for six home units in a rental development that includes Low Income Housing Tax Credit (LIHTC).
6	Project Name	City of Tucson HOME Rental Development

	Target Area	Citywide
	Goals Supported	Rental Housing Development
	Needs Addressed	Decent Affordable Rental Housing
	Funding	HOME: \$1,051,669
	Description	City of Tucson HOME Rental Development Project.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	The City of Tucson projects 60 units of new construction for low and moderate income households.
	Location Description	This project is Citywide but it is projected that 50% will be in the City of Tucson CDBG Target Area.
	Planned Activities	The City of Tucson will prioritize local HOME funds for rental projects within the City limits that are included in competitive applications for the allocation of State of Arizona Low-Income Housing Tax Credits (LIHTC). The local government contribution and commitment amount will remain flexible to address annual changes to the State's Qualified Allocation Plan (QAP) guidelines and to award HOME funds on a case-needed basis if other sources of local contributions, such as fee waivers or incentives, are available to satisfy the requirement. The set-aside of HOME funds as a source of local government contribution for LIHTC projects will continue to be a high priority for the City of Tucson in the development, rehabilitation and preservation of affordable rental housing. FY2019 funding includes an estimated \$500,000 of program income.
7	Project Name	City of Tucson Home Ownership - Down Payment Assistance
	Target Area	Citywide
	Goals Supported	Home Purchase Assistance
	Needs Addressed	Decent Affordable Owner Housing
	Funding	HOME: \$300,000
	Description	The City of Tucson projects HOME Program home buyer down payment assistance will be provided to 60 families that are first time home buyers.
	Target Date	6/30/2020

	Estimate the number and type of families that will benefit from the proposed activities	60 low to moderate income families.
	Location Description	City of Tucson
	Planned Activities	The City of Tucson anticipates using \$300,000 in HOME funds for Home Owner assistance to 60 new home buyers.
8	Project Name	Pima County HOME Administration
	Target Area	Citywide
	Goals Supported	Administration
	Needs Addressed	Decent Affordable Rental Housing
	Funding	HOME: \$87,704
	Description	This funding supports Pima County HOME program administration costs.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	n/a
	Location Description	Countywide
	Planned Activities	These funds support administration for the Pima County HOME program. They will help support one FTE position.
9	Project Name	Pima County HOME Ownership (Development and Down Payment Assistance)
	Target Area	Citywide
	Goals Supported	Home Purchase Assistance
	Needs Addressed	Decent Affordable Owner Housing
	Funding	HOME: \$200,000
	Description	This project provides assistance to home buyers for purchase of new or existing affordable housing units.
	Target Date	6/30/2020

	Estimate the number and type of families that will benefit from the proposed activities	Twenty-five (25) low to moderate income home buyers.
	Location Description	Countywide
	Planned Activities	Provide down payment assistance to home buyers for the purchase of new or existing affordable housing.
10	Project Name	Pima County HOME Rental Development
	Target Area	Citywide
	Goals Supported	Rental Housing Development
	Needs Addressed	Decent Affordable Rental Housing
	Funding	HOME: \$349,440
	Description	This project will leverage funds for the new construction of rental housing units for low and very-low income renters.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Seven (7) low to moderate income families.
	Location Description	Countywide
	Planned Activities	Provide funding for the development and construction of rental properties. Prioritize projects that maximize funding leveraged from other public and private resources, including but not limited to: Low Income Housing Tax Credit Program; Federal Home Loan Bank of San Francisco AHP, WISH, IDEA Programs; local bond programs; land and resources donated by local municipalities.
11	Project Name	Pima County HOME Tenant Based Rental Assistance (TBRA)
	Target Area	Citywide
	Goals Supported	Rapid Rehousing/TBRA
	Needs Addressed	Decent Affordable Rental Housing
	Funding	HOME: \$50,000

	Description	PPima County is completing the planning stages for a TBRA Pilot program that is being designed to assist low and very low income working families in transition (homeless or at-risk homeless families and individuals) as well as households displaced from dilapidated manufactured homes. Assistance the will be limited to individuals who are referred through a County job training program, a County approved inmate re-entry program or by the County Mobile Home working group.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Six (6) families or individuals in transition including homeless or at-risk homeless families, individuals, and ex-offenders.
	Location Description	Countywide
	Planned Activities	Provide tenant based rental assistance to low and very low income persons, families specifically those that are homeless, at risk of being homeless and ex-offenders.
12	Project Name	City of Tucson Rental - El Portal
	Target Area	Citywide
	Goals Supported	Rental Housing Development
	Needs Addressed	Decent Affordable Rental Housing
	Funding	HOME: \$1,000,000
	Description	Rehabilitation of Dodge El Portal Units
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	26 single person households.
	Location Description	5th Street and Dodge Boulevard
	Planned Activities	Rehabilitation of 26 studio units.
13	Project Name	CDBG Lead Grant Match
	Target Area	Citywide
	Goals Supported	Owner-occupied Housing Rehabilitation

	Needs Addressed	Decent Affordable Rental Housing
	Funding	CDBG: \$125,000
	Description	Lead Base Paint Hazard Control (LBPHC) Program 2016 Grant Match. The City of Tucson was awarded the 2016 LBPHC grant which required 10% match. This is round two of the CDBG Match.
	Target Date	9/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	n/a
	Location Description	Citywide
	Planned Activities	Lead-Based Paint Hazard Control (LBPHC) Program will target and serve low to very-low income families with children under six years of age—residing or frequenting owner occupied or rental housing built prior to 1978. This may also include rental units if both landlords and renters are eligible to participate.
14	Project Name	Human and Public Services
	Target Area	TUCSON, AZ Citywide
	Goals Supported	Human and Public Services
	Needs Addressed	Human Services
	Funding	CDBG: \$827,830
	Description	This project includes FY 2018 CDBG-funded activities, which will provide crisis assistance and emergency assistance. Approximately 20% of the funding will be spent in the adopted CDBG target area. All funding will be directed to support programs that serve low to moderate income individuals and families.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 1,260 households will benefit from CDBG Human Services funding.
	Location Description	

	Planned Activities	<p>The City of Tucson is recommending CDBG funding for projects that address crisis assistance, intervention and prevention of domestic violence. CDBG funds will also assist homeless persons and families by supporting emergency shelters, outreach, case management and support services.</p> <p>The City of Tucson is recommending General Funds for 32 projects that provide support services including education, youth programs, elderly programs, nutrition assistance, food programs and family support.</p>
15	Project Name	Owner Occupied Housing Rehabilitation
	Target Area	TUCSON, AZ Citywide
	Goals Supported	Owner-occupied Housing Rehabilitation
	Needs Addressed	Decent Affordable Owner Housing
	Funding	CDBG: \$1,912,263
	Description	This program will assist 88 households with comprehensive housing rehabilitation services including roof replacement, home repairs, accessibility and sustainable housing rehabilitation. All households served will qualify as low/moderate income households.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	The program will serve approximately 88 low to moderate income homeowner households.
	Location Description	Citywide

	Planned Activities	<p>The program will have two focus areas: 1) Healthy Homes Rehabilitation, and 2) Home Access.</p> <p>The Healthy Homes Rehabilitation Program will affect enduring functional and aesthetic improvement to Tucson housing and neighborhoods by providing a comprehensive rehabilitation of all systems within a home to mitigate hazards and correct all deficiencies in a minimum of 40 low income single family owner-occupied homes.</p> <p>The Home Access Program will remove barriers to safe access, allow a greater level of independent living, and reduce institutionalization for disabled persons through accessibility improvements and upgrades for approximately 48 low-income single-family owner-occupied homes. FY2019 funding includes an estimated \$500,000 of prior year resources.</p>
16	Project Name	Public Facilities and Infrastructure
	Target Area	TUCSON, AZ Citywide
	Goals Supported	Facilities and Infrastructure
	Needs Addressed	Revitalization, Public Facilities & Infrastructure
	Funding	CDBG: \$1,950,000
	Description	The ADA infrastructure improvements will be funded with \$1,650,000 CDBG to expand ADA compliance. The City of Tucson will fund facility improvements under the City of Tucson/Pima County Safe Healthy and Green program in the amount of \$200,000. The City of Tucson will allocate \$250,000 of CDBG funding in support of the Oracle Choice Neighborhoods Initiative and to further implementation of recommendations from both the Community Based Crime Reduction Initiative and the Rose Center Fellowship.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	<p>The Safe Healthy and Green program will serve approximately 100 person that are homeless or in need of crisis assistance.</p> <p>ADA improvements will serve approximately 10,500 persons who are elderly or disabled.</p>
	Location Description	Approximately 70% of projects will be in the City of Tucson CDBG Target Area.

	Planned Activities	<p>The City of Tucson and Pima County have implemented a CDBG funded Safe Healthy and Green program for an initial five years through FY 2018 to retrofit shelters and public service facilities for energy efficiency and sustainability. The program has been extended through FY 2019.</p> <p>The ADA improvements will upgrade public facilities to expand ADA compliance.</p> <p>The City of Tucson will allocate \$250,000 of CDBG funding for ADA and facilities improvements in the Oracle Choice Neighborhoods area.</p> <p>FY2019 funding includes an estimated \$50,000 of program income.</p>
17	Project Name	CDBG Administration and Planning
	Target Area	Citywide
	Goals Supported	Administration
	Needs Addressed	Decent Affordable Rental Housing Decent Affordable Owner Housing Homelessness Human Services Revitalization, Public Facilities & Infrastructure
	Funding	CDBG: \$1,103,773
	Description	These funds will be used to administer all CDBG activities. \$76,827 will be used for planning activities and \$40,000 for Fair Housing education and compliance, and \$25,000 for a consultant to assist with preparation of the upcoming 2020-2025 HUD Five-year Consolidated Plan.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	This funding is for administration and includes two planning activities.
	Location Description	Citywide
	Planned Activities	Administrative activities that support the implementation of the CDBG grant.
18	Project Name	CDBG Section 108
	Target Area	TUCSON, AZ
	Goals Supported	Job Creation
	Needs Addressed	Economic Development

	Funding	Section 108: \$8,000,000
	Description	The Section 108 Loan of \$8 million was awarded to assist in funding the development of an AC Marriott hotel which will provide approximately 160 jobs.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	160 low to moderate income individuals.
	Location Description	The AC Marriott is located at the northwest corner of north 5th Avenue and east Broadway Boulevard in downtown Tucson.
	Planned Activities	A Section 108 loan of \$8 million was awarded to assist in funding the development of an AC Marriott hotel which will provided approximately 160 jobs for low and moderate income persons. Construction of the AC Marriott hotel is now complete. The hotel opened in October of 2017. Employment data will be posted as it becomes available.
19	Project Name	Pima County HOME Preservation
	Target Area	Citywide
	Goals Supported	Owner-occupied Housing Rehabilitation
	Needs Addressed	Decent Affordable Owner Housing
	Funding	HOME: \$180,000
	Description	Develop a housing rehabilitation/replacement program model that will use HOME funds to leverage other resources to greatest extent possible.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Two (2) low to moderate income homeowner households.
	Location Description	Countywide
	Planned Activities	

AP-50 Geographic Distribution - 91.420, 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Unless otherwise noted, the projects and activities listed in this Annual Plan are offered City-wide to homeless persons, senior citizens, low-income residents, people with disabilities, people with HIV/AIDS, survivors of domestic violence, and Tucson's youth.

Over many years, the City of Tucson has documented and published an Urban Poverty and Stress Report. This report compares census tract data showing the areas with highest stress compared to the City as a whole, including factors such as income levels, education, housing issues and incidence of crime. Recognizing disparities in income, employment, housing conditions and choice, and facilities which are indicators of urban stress, the City of Tucson adopted a Community Development Block Grant (CDBG) Target Area in program year 2013. This Target Area is based on information contained in a 2012 update to the City's Poverty and Urban Stress Report and intersects with areas of minority concentration and high poverty rates as shown in the City of Tucson, City of South Tucson and Pima County 2014 Promise Zone application.

Geographic Distribution

Target Area	Percentage of Funds
TUCSON, AZ	40
Citywide	60

Table 5 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City of Tucson CDBG Target Area, which encompasses approximately 12.7 percent of the City by area, will be a primary focus for investment over the 5-year Consolidated Plan period (July 1, 2015 through June 30, 2020). The City estimates that \$4,000,000 will be invested in the City of Tucson CDBG Target Area in FY 2019, approximately 40% of the City of Tucson's entitlement grant funding for FY 2019. The City's goal is to invest in facilities, housing, job opportunities and support services for residents living the target area to reduce urban stress and leverage other community investments in a comprehensive revitalization effort in the target area.

Discussion

The City of Tucson will track activity funded within the City of Tucson CDBG Target Area and complete an evaluation of geographic distribution of investments that will be included in the Consolidated Annual Performance and Evaluation Report (CAPER) in fall 2018.

See Attachment 6 – AP-50 Additional Information, rationale for allocating investments geographically.

Affordable Housing

AP-55 Affordable Housing - 91.420, 91.220(g)

Introduction

The City of Tucson plans to provide affordable housing to 582 households. This includes rapid rehousing and permanent housing for the homeless, tenant based rental assistance for the homeless and special needs populations, new construction of rental units, home owner rehabilitation and home buyer assistance. In addition, the City will use General Fund dollars to provide 88 low income households with Acute Emergency Home Repairs and 155 low income elderly/disabled household with Home repair, adaptation and maintenance.

One Year Goals for the Number of Households to be Supported	
Homeless	273
Non-Homeless	213
Special-Needs	96
Total	582

Table 6 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	319
The Production of New Units	30
Rehab of Existing Units	164
Acquisition of Existing Units	69
Total	582

Table 7 - One Year Goals for Affordable Housing by Support Type

Discussion

Aquisition of units includes home buyer assistance to renters acquiring home ownership units. (There is not a concise category to show this commitment of HOME and Tucson Housing Trust Fund money.)

The City of Tucson is the lead agency in the Consortium. The above numbers include Pima County commitment of HOME funds to new construction of rental housing and home purchase assistance.

AP-60 Public Housing - 91.420, 91.220(h)

Introduction

The City of Tucson Public Housing Authority (PHA) assists low-income renters by providing 1,505 units of public housing and other affordable rental housing; and 5,654 Section 8 Housing Choice Vouchers including 877 administered for Pima County, 636 HUD VASH vouchers for Veterans, 150 Family Unification Vouchers, and 46 Moderate Rehabilitation program units.

The City's public housing and other affordable rental housing units are administered by property management offices regionalized throughout the City. The property management team at each office is responsible for residential property management activities associated with its assigned projects including property maintenance and modernization work.

Actions planned during the next year to address the needs to public housing

Per the City of Tucson's PHA plan, the following are actions planned to address the the needs of public housing:

- Apply for additional rental voucher when available.
- Expand the availability of Housing Choice Vouchers and Public Housing units to homeless individuals and families.
- Reduce vacancies in public housing units by decreasing turnover time to 30 days or less.
- Pursue endeavors to increase the supply of accessible housing through development and rehabilitation.
- Afford opportunities to provide project-based vouchers to non-profit agencies that serve special populations and promote access to case management and other services.
- Continue to analyze the feasibility of Rental Assistance Demonstration (RAD).

In 2016 and 2017 the City of Tucson applied for Choice Neighborhoods Planning and Action Grants from the U.S. Department of Housing and Urban Development (HUD). The Choice Neighborhoods application, known as the Oracle Choice Neighborhoods Initiative (OCNI) encompasses 2.6 square miles and includes Tucson House, a 408 unit, seventeen-story public housing facility serving elderly and disabled persons that represents 27% of the local PHA public housing portfolio. A physical needs assessment for Tucson House prepared in support of the OCNI resulted in a "severely distressed" designation, due to the antiquated physical systems in the building. Tucson House is located in a high-stress neighborhood with an adopted revitalization area plan, the Oracle Area Revitalization Project (OARP).

The applications were not selected for funding. The City will evaluate future Choice Neighborhood grants if they become available and will continue to pursue other avenues to address the needs identified in the Choice Neighborhoods application to transform and revitalize Tucson House and the surrounding neighborhood.

In October 2017, the Arizona State University School of Social Work was awarded funding for a Community Based Crime Reduction initiative for the Oracle Area. This initiative will support research, planning, and implementation activities to address social drivers of crime within an area that is largely coincident with the OARP and OCNI area. The Rose Center for Public Leadership in Land Use, a program of the National League of Cities (NLC) in partnership with the Urban Land Institute (ULI) chose the Oracle Area for its 2018 Fellowship Program. The Fellowship Program provided recommendations to improve community engagement, corridor identity, and pedestrian safety (approximately 2/3 of renters in the area who have no car). The City of Tucson will allocate \$250,000 of CDBG funding for facilities and infrastructure projects to further implementation of recommendations from both the Community Based Crime Reduction Initiative and the Rose Center Fellowship.

Through the above noted opportunities and others, the PHA will investigate options for making the needed improvements to Tucson House and will continue to integrate Tucson House residents and neighbors into collective processes and projects that will benefit all.

Energy Performance Contract: The PHA has done some preliminary evaluations and is considering an energy performance contract for the entire portfolio of public housing.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

The Family Self Sufficiency (FSS) program is a voluntary program available to families who receive rental assistance through the public housing and Section 8 Housing Choice Voucher programs. Participants must have a genuine desire to work toward a living wage career within a five year period. Participants set and meet long and short-term goals for education, training, career development and job retention. The program's main focus is to help participants reach self-sufficiency so that they no longer need to depend on public assistance programs in order to provide for their families. Homeownership, savings and financial education are encouraged. Approximately one-third of graduates move on to homeownership.

The Resident Opportunities for Self-Sufficiency (ROSS) program provides additional assistance to public housing residents who may need more time to meet self sufficiency goals due to language barriers or lack of high school diploma. This is a three year program that will allow a participant to then transfer to the FSS program if more time is needed.

The Section 8 Home Ownership Program (SEHOP) provides an opportunity for low-income Housing Choice Voucher (HCV) holders to achieve homeownership. As of 2014 HCD had 25 HCVs available from AZ004 and an additional 15 HCVs from AZ033 for homeownership. Moreover, staff works with homeownership clients to educate them about other resources available in the community, e.g. those available through the City's HOME program, Federal Home Loan Bank, sponsors of Individual Development Accounts, and products sponsored by the Industrial Development Authority such as

mortgage revenue bonds and mortgage credit certificates.

Section 3 Plan: In accordance with the Section 3 Plan for The City of Tucson, the resident councils, as well as neighborhood associations are provided with information and their assistance is requested in notifying residents of available Section 3 training and employment opportunities. Additionally, training and employment opportunities are advertised in residents' newsletters as well as at all public housing management offices.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

N/A

Discussion

AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i)

Introduction

The Annual Point in Time count in January 2017 counted 1,574 unduplicated persons in 1,329 households who were homeless and staying in shelters, permanent housing or on the streets. Of these 1,574 people, 1370 (87%) were adults and 204 (13%) were children. In addition, the Veterans count showed 243 households and 257 person and other homeless subpopulations for a total of 382. When posted the 2018 Point-in-Time Count will be available at www.tpch.net. ***(Updated information for 2018 will be provided if it becomes available prior to submittal to the Department of Housing and Urban Development)***

The City of Tucson is a member of the Tucson/Pima Collaboration to End Homelessness (TPCH). TPCH is a coalition of community and faith-based organizations, government entities, businesses, and individuals committed to the mission of ending homelessness and addressing the issues related to homelessness in Tucson and Pima County. They are charged with implementing the 2015 Continuum of Care Strategic Plan to End Homelessness. TPCH tracks all persons needing housing assistance through the Homeless Management Information System (HMIS) and then assesses and refers them to appropriate agencies. Information on the TPCH strategic plan can be found at www.tpch.net.

The City of Tucson and Pima County 5-year Consolidated Plan includes the goal of permanent supportive housing units to the existing inventory. To assist with permanent housing, the Public Housing Authority (PHA) added a preference for homeless households limited to 10% of the PHA's portfolio of 1,505 total units and 10% of the PHA's voucher's (not including vouchers set aside for other special populations). The PHA awarded, through a competitive process, Human/Public Services Funds to several agencies to provide case management and 'wrap around services' to assist clients to transition to permanent housing. For FY 2015, thirty public housing units and fifty housing choice voucher were made available for qualified homeless families. In FY 2016, 100 housing choice vouchers were made available to agencies to be used for qualified homeless individuals and families. In FY 2018 150 public housing units and 479 housing choice voucher were made available for qualified homeless families.

Beginning 7/1/17 the PHA made available for referrals by any TPCH agency the remaining 314 homeless preference vouchers and 120 homeless preference Public Housing units with the following criteria:

- Individuals with a VI-SPDAT score of 14 or greater regardless of the chronicity status (HCV only)
- Individuals or families moving on from Permanent Supportive Housing that have been stably housing for 1 year or more, are actively engaged with medical and/or behavioral health services, have established regular income, have established relationships with mainstream resources, and have minimal need for regular case management targeting housing stability. (HCV or PH)
- Homeless families with children (Public Hosing only)

The City also participated in the following efforts using these as a foundation for addressing the most

serious issues associated with chronic homelessness; please see **Attachment 7 – AP-65** Additional Information for Introduction Section regarding 51 Homes and 25 Cities.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

For Fiscal Year 2019, the City of Tucson plans to use CDBG and ESG money to fund a variety of non-profit agencies to provide services to persons experiencing homelessness, those at risk of being homeless and homeless families with children. These activities are summarized below.

- Fund providers through the Continuum of Care process that propose to link housing to services
- Add 100 units of permanent supportive housing to existing housing inventory.
- Identify the needs of homeless and adapt the service system to meet their needs. Increase shelter services, transitional and permanent supportive housing
- Seek additional funds for medical, behavioral, substance abuse, and mental health services
- Fund services that enhance discharge planning and other preventive services
- Institute preventions strategies for rent, utility and mortgage assistance and debt and mortgage counseling
- Provide short-term assistance in the form of emergency shelters and motel vouchers
- Provide employment and training tied to housing assistance
- Implementation of Continuum of Care strategies through participation in the local process – Tucson/Pima Collaboration to End Homelessness (TPCH)
- Development of housing targeted to special needs populations
- Continued implementation of the TPCH Strategic Plan
- Expand permanent housing options for homeless individuals by increasing the number of public housing units and housing choice vouchers made available to qualified homeless individuals/families.

Addressing the emergency shelter and transitional housing needs of homeless persons

ESG funds will be applied to projects providing shelter and assistance to homeless persons as well as providing funds to prevent homelessness. Funds provide essential services, including operations and maintenance for facilities assisting homeless persons and services that prevent homelessness. Shelter Plus Care, Supportive housing and Rapid Rehousing will be used to pursue the majority of the housing

and community development strategies to address homelessness. This will include permanent supportive housing and supportive services for the following targeted homeless populations:

- Low-income individuals and families with children;
- Single unaccompanied youth
- Pregnant and parenting youth
- Single women or men with children
- Severely mentally ill persons
- Chronically homeless individuals with multiple barriers to employment
- Veterans
- Victims of domestic violence

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The City is investigating options of providing a facility that assists homeless individuals. This could include a homeless campus or a 24 hour public restroom structure.

The City of Tucson intends to encourage local non-profit housing and support service agencies to pursue all available public and private funding to achieve the goals in the FY 2015 – 2020 Consolidated Plan. It is expected that funding from a combination of federal, state, local and private sources will be used to pursue the majority of the housing and community development strategies. All eligible funding will be pursued and non-profit entities will be encouraged to work with financial institutions to develop plans for leveraging private and public funds to the maximum extent possible.

The ECHO (Ending Chronic Homelessness) Permanent Supportive Housing Program is a collaborative effort that provides direct links between permanent housing, supportive services and employment programs to 63 clients including disabled individuals, chronically homeless individuals and families with children.

Pathways: The Pathway's program provides permanent supportive housing to a target population consisting of 16 clients that are experiencing homelessness including those chronically homeless, veterans, individuals', families, domestic violence, substance abuse, mental illness and HIV/AIDS.

Shelter Plus Care Partnership: The Shelter Plus Care Partnership program provides permanent supportive housing to a target population consisting of 88 clients that are experiencing homelessness including those chronically homeless, veterans, individuals', families, victims domestic violence,

substance abuse, mental illness and HIV/AIDS.

Shelter Plus Care IV - Operation Safe At Home: The Shelter Plus Care IV program provides permanent supportive housing and services to a target population consisting of 81 clients who are experiencing homelessness including those chronically homeless, disabled veterans, domestic violence, substance abuse, mental illness and HIV/AIDS.

Prevention services include programs aimed at maintaining people in their homes, i.e. rent and mortgage assistance, utility payment assistance to prevent eviction, case management, housing counseling, landlord/tenant mediation/legal services, behavioral health services, referral services, income maintenance programs and food stamps, job training and placement, and guardianship/representative payee. In addition, prevention programs include supportive education regarding an owner/landlord's specific requirements, and information on tenants' rights and obligations under Arizona law.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

A subcommittee of the Tucson Pima Collaboration to End Homelessness (TPCH) established discharge procedures for homeless patients with all hospitals in Tucson/Pima County. These procedures were supplemented with information regarding shelter operations, admission requirements, names and addresses of emergency shelters and shelter staff. A workgroup has been formed to encourage additional coordination.

While the Prisoner Re-Entry program funded by the Department of Labor Employment and Training Administration has ended, local agencies Primavera Foundation and Old Pueblo Community Services continue to offer re-entry assistance to men and women recently released from the Department of Corrections facilities and reentering the community after incarceration. An array of enhanced and graduated supportive services is offered including individualized case management and transitional living facilities.

The City of Tucson is collaborating with Pima County on the Pay for Success Social Impact Bond program (or successor program) aimed at providing Permanent Supportive Housing to homeless clients that have been incarcerated two or more times in the past year and have a mental health diagnosis.

Discussion

Funding to agencies described in the action plan is provided in the form of a contract between the recipient agency and the Housing and Community Development Department. The contract contains terms and conditions of funding, reporting and invoice requirements, performance and outcome expectations and service delivery levels, record keeping responsibilities, and consent to on-site monitoring as requested by the city. Funds are awarded to the ESG grantees on a competitive basis. The Request for Proposal Notice is released through the Continuum of Care as well as through the City Participation Process. The City Of Tucson and Pima County jointly make the funding allocations. Members of the allocation committee are selected for their knowledge of services and participation in the Continuum. Every effort is made to involve a homeless or formerly homeless person in the process. The committee ranks the proposals individually and then reviews them as a committee and makes the final funding recommendations.

AP-70 HOPWA Goals - 91.420, 91.220 (I)(3)

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	150
Tenant-based rental assistance	20
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	57
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	65
Total	292

AP-75 Barriers to affordable housing -91.420, 91.220(j)

Introduction

The City of Tucson's action plan to barriers to affordable housing include:

- The City Of Tucson will continue to provide down payment and closing cost assistance for first time Homebuyers using funds from the Tucson Housing Trust Fund and HOME.
- Increase affordable housing options by dedicating HOME Rental Development funding for Low Income Tax Credit Housing projects and other projects publically funded.
- The City of Tucson will continue to use CDBG funds for our housing rehab program that helps maintain our housing stock and enables low/moderate income individuals to stay within their homes.
- Over the years, the City of Tucson has acquired residential properties in order to increase the affordable housing market in Tucson. Our El Portal portfolio is comprised of approximately 280 dwelling units owned by the City, which are not part of the Public Housing Authority, and are made available for rent to low/moderate income families.
- The City of Tucson will continue to monitor the Pima County Community Land Trust. This trust was created to address the high number of foreclosed homes that occurred during the recession. Foreclosed homes were acquired and rehabbed using the City's NSP 1, 2 and 3 funds. These homes were then transferred to PCCLT who in turn sells them to income eligible households.
- In FY 2019, the City of Tucson will began the close-out process for our NSP 1 and NSP 3 programs by using all remaining treasury funds to purchase, rehabilitate, and resell a foreclosed home within the NSP program area.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

- Making contingent commitments of HOME funds of qualifying projects seeking Low-income Housing Tax Credit (LIHTC) financing;
- Providing preservation/enhanced vouchers for residents of projects with expiring periods of affordability, contingent upon at least twelve months' notice from the property owner;
- Improving the permit process for contractors rehabilitating the existing housing stock and developers undertaking infill projects.
- Providing a waiver for development impact fees for non-profit affordable housing providers

when their residential development is for households that earn less than 100 percent of the area median income.

- To assist with permanent housing, the Public Housing Authority (PHA) added a preference for homeless households limited to 10% of the PHA's portfolio of 1,505 total units and 10% of the PHA's voucher's (not including vouchers set aside for other special populations). For FY 2015, thirty Public housing units and fifty housing choice voucher were made available for qualified homeless families. In FY 2016, 100 housing choice vouchers were made available to agencies to be used for qualified homeless individuals and families. In FY 2018 150 public housing units and 479 housing choice voucher were made available for qualified homeless families.

The City of Tucson plans to explore the following to mitigate and remove barriers:

- Fast-track permitting and approvals for affordable housing projects.
- Develop a policy that adjusts or waives existing parking requirements for affordable housing projects.
- The Infill Incentive District (IID) was adopted specifically to support the creation of urban neighborhoods, encourage sustainable infill development and address barriers to development in the downtown area.

Pima County's Comprehensive Plan – Pima Prospers – was finalized in 2016. Pima Prospers provides a structure for directly and indirectly addressing regulatory barriers to affordable housing development. The County will begin to implement the goals and policies of the Plan, including:

1. Reviewing the Inclusive Design Ordinance to consider further changes that will encourage aging in place, universal design and accessibility amendments.
2. Supporting a secondary dwelling ordinance or update to include innovative design and development standards, permit procedures, community education and a variety of incentives such as flexible zoning requirements and development standards; and allowing for owner-occupancy in either primary or secondary units.
3. Supporting an incentive program for developers to build innovative residential product types and designs of varying densities.
4. Integrating fair housing goals into planning and development processes to provide for a range and mix of household incomes and family sizes.
5. Providing a manual of strategies for creating a healthier environment based on the latest research and best practices in the field.
6. Implementing a Health Impact Assessment program for public and publicly-funded projects based on healthy communities principles.
7. Embracing principles of affordability and green building as mutually beneficial in reducing energy consumption, water use, material use and creating a healthier indoor environment; periodically updating existing codes and regulations to include the latest green standards,

techniques and material; and creating an incentive program to encourage incorporation of green building techniques.

Discussion

None

AP-85 Other Actions - 91.420, 91.220(k)

Introduction

This section discusses the City's efforts in addressing underserved needs, expanding and preserving affordable housing, reducing lead-based paint hazards, and developing institutional structure for delivering housing and community development activities.

Actions planned to address obstacles to meeting underserved needs

The City's central long-term community development goal is to focus resources on community needs, particularly the comprehensive revitalization of distressed areas and areas with high levels of poverty. Assisting LMI households throughout the City is a key community goal intended to ensure that neighborhoods not currently in distress do not become so. The City's General Plan – Plan Tucson – supports a framework of local policies that can significantly and positively impact housing and other needs of LMI residents and neighborhoods. The City's expectations are focused on sustainability, reserving land for economic development, and revitalization. Plan Tucson includes 4 focus areas – social, economic, natural and built environments. While many of the City's General Plan goals and policies are inter-related with Consolidated Plan goals and policies, the most relevant housing and community development goals include stabilizing and improving the existing housing stock, increasing affordable housing options, and support programs that expand economic development opportunities. The City of Tucson will support non-profit agencies that provide

- Provide support to elderly and disabled including emergency repairs, senior companion program, independent living support, mobile meals, nutrition programs, respite programs and homecare services
- Provide support for youth and families including early childcare development, daycare tuition support, parent education and support, and after school programs.
- Support services including temporary shelters for homeless and victims of domestic violence, plus other support such as case management, emergency food assistance, intervention.

Community Planning Efforts focused on seniors: On September 7, 2016 Mayor and Council adopted Resolution #22621 related to Tucson's Designation as a World Health Organization (WHO) Age Friendly City. The PHA participates in the planning process that is focused on the needs of seniors. This effort will result in a plan that incorporates benchmarks that can be used to set goals for Tucson's AARP Plan and to measure progress in meeting those goals. The livability issues listed below were identified by a national AARP survey and are consistent with the goals of the PHA:

- More housing options, affordable housing including accessory dwelling units, and active/assisted living communities
- Accessible and affordable public transportation
- Increased police presence and communication between police and community residents

- Housing located close to stores, transportation, health care facilities and other community services.

Actions planned to foster and maintain affordable housing

- Increase affordable housing options by prioritizing HOME Rental Development Funding for Low Income Housing Tax Credit Housing Projects. Developers of affordable housing are finding it more difficult to finance their projects. The ability to win a LIHTC project is becoming more competitive as other traditional funding options are more restrictive or no longer available. Therefore, the City of Tucson will provide conditional support of project costs for gap funding for applications meeting the City's requirements. This support will allow applicants to gain additional points which may then facilitate a successful application.
- Coordinate housing counseling and education resources with down payment, closing cost and new development funding. Offer counseling and education to owners in gentrifying neighborhoods.
- Continue to support the Housing Rehab program that provides rehab assistance to low-income owner occupants. This rehab assistance ensures these occupants may continue to live in their homes.
- Provide preservation / enhanced vouchers for residents of projects with expiring periods of affordability, contingent upon at least twelve months notice from the property owner.

Actions planned to reduce lead-based paint hazards

Any structure built before 1978 that is proposed for rehabilitation under federal programs is tested for lead-based paint. Notices and requirements regarding testing and removal of lead-based paint are provided to program participants, contractors and project sponsors. Licensed contractors are available to perform appropriate abatement and/or removal procedures if lead-based paint is present.

The City follows strict HUD guidelines for testing and abatement of lead-based paint and other hazardous substances, requiring contractor and subcontractor compliance with guidelines. Rehabilitation activities are procured through a bidding process and contracted to licensed contractors. All contractors and subcontractors are required to comply with HUD Lead Safe Housing requirements and federal National Environmental Policy Act environmental review procedures. In addition, the City follows a multi-pronged approach to reduce lead hazards:

1. Section 8 Housing Choice Vouchers. The PHA inspects prospective dwellings constructed prior to 1978 that will have a child under the age of six residing therein, for compliance with EPA and HUD Lead Based Paint rules and regulations. The inspection includes visual inspections for chipped, peeling, chalking and deteriorated interior and exterior paint. Clearance testing may be performed after remediation by the property owner, to assure a lead-safe environment.

2. Public Education. Lead Hazard Information is distributed to participants in homeownership and rental programs including distribution of HUDs *Protect Your Family from Lead in your Home* brochure.

The City of Tucson applied for a Lead Based Paint Hazard Control and Healthy Homes Grant in April of 2016, and is currently operating a \$2.9 million Lead based Paint Hazard Control (LBPHC) + Healthy Homes Program.

Actions planned to reduce the number of poverty-level families

The City of Tucson will work to increase economic activity, promote jobs-based education, and provide services to help lower-income households attain higher-wage employment. Together these efforts serve to reduce the incidence of poverty.

- Most activities undertaken with CDBG, HOME, ESG and HOPWA funds are efforts to reduce the number of persons living in poverty and improve the quality of life for city residents. The City will continue to support emergency assistance programs, and a variety of other support services that are used by low-income households to obtain basic necessities.
- Continue to support economic development activities and employment, focusing on employment convenient to public transportation and working in partnership with workforce investment agencies;
- Continue to incorporate training for contractors and other private sector entities to increase understanding of and participation in HUD programs, with emphasis on Section 3 and Labor Standards that promote economic self-sufficiency
- On March 17, 2015 HUD conditionally approved a Section 108 loan in the amount of \$8 million for a downtown hotel project (AC Marriott). Construction has been completed the hotel is now open. This project will create approximately 160 new jobs.
- **Oracle Choice Neighborhoods and Related Initiatives:** In 2016 and 2017 the City of Tucson applied for Choice Neighborhoods Planning and Action Grants from the U.S. Department of Housing and Urban Development (HUD). The Choice Neighborhoods application, known as the Oracle Choice Neighborhoods Initiative (OCNI) encompasses 2.6 square miles and includes Tucson House, a 408 unit, seventeen-story public housing facility serving elderly and disabled persons that represents 27% of the local PHA public housing portfolio. A physical needs assessment for Tucson House prepared in support of the OCNI resulted in a “severely distressed” designation, due to the antiquated physical systems in the building. Tucson House is located in a high-stress neighborhood with an adopted revitalization area plan, the Oracle Area Revitalization Project (OARP).

The applications were not selected for funding. The City will evaluate future Choice Neighborhood grants if they become available and will continue to pursue other avenues to address the needs identified in the Choice Neighborhoods application to transform and revitalize Tucson House and the surrounding neighborhood.

In October 2017, the Arizona State University School of Social Work was awarded funding for a Community Based Crime Reduction Initiative for the Oracle Area. This initiative will support research, planning, and implementation activities to address social drivers of crime within an area that is largely coincident with the OARP and OCNI area.

The Rose Center for Public Leadership in Land Use, a program of the National League of Cities (NLC) in partnership with the Urban Land Institute (ULI) chose the Oracle Area for its 2018 Fellowship Program. The Fellowship Program provided recommendations to improve community engagement, corridor identity, and pedestrian safety (approximately 2/3 of renters in the area who have no car). The City of Tucson will allocate \$250,000 of CDBG funding for facilities and infrastructure projects to further implementation of recommendations from both the Community Based Crime Reduction Initiative and the Rose Center Fellowship.

- **Energy Performance Contract:** The PHA has done some preliminary evaluations and is considering an energy performance contract for the entire portfolio of public housing.

Actions planned to develop institutional structure

The Delivery System provides a full array of services to low and moderate income households and people with special needs, including people with HIV/AIDS. HCD carries out its mission through direct delivery of services and programs and funding of other City departments, nonprofit organizations and for-profit developers. Specific agencies and organizations that work with the City are selected on an annual basis. The City of Tucson recognizes the benefits of increasing administrative efficiencies to improve the delivery system. Planned actions for the coming year include:

1. In FY 2018, City and County coordinate the application process for public services. This allowed applicants to prepare Request for Proposal responses electronically using the same software for both the City and County. This reduced duplication of applications for same services.
2. In FY 2018, The City of Tucson required agencies applying for public service grants to request a minimum of \$50,000 per grant to reduce the number of grants awarded thereby reducing administrative costs.
3. Evaluate renewable (multi-year) contracts contingent on performance;
4. Dedicating resources to coordinated assessment

5. Evaluate the Housing Rehab program to ensure we are meeting the needs of the clients while complying with the federal regulations. We will also look at ways to reduce administrative costs thereby allowing more funds to assist homeowners.

Actions planned to enhance coordination between public and private housing and social service agencies

The City benefits from a city-wide network of housing and community development partners, such as the Tucson Metropolitan Housing Commission, the Housing Rehab Collaborative, the Tucson Pima Collaboration to End Homelessness, and Pima County Community Development and Neighborhood Conservation Department. The City will continue to create partnerships between public institutions, non-profit organizations, and private industry for the delivery of affordable housing and community development activities for low-and moderate-income households, neighborhoods, and at risk populations. The use of non-profit agencies to deliver such services has expanded over the past several years, thus increasing the coordination and cooperation between the City and these entities.

Discussion

Program Specific Requirements

AP-90 Program Specific Requirements - 91.420, 91.220(l)(1,2,4)

Introduction

The City of Tucson will have estimated amount of \$500,000 in HOME Program Income to be committed and spent down in the upcoming fiscal year. CDBG Program Income of \$50,000 will be also be reprogrammed in the coming fiscal year. Proceeds from Section 108 projects will not be received in this program year and surplus funds, returned funds or float-funded activities do not apply to the City of Tucson.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	50,000
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	50,000

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The top priority of the HOME program is the commitment of rental development funds to Low Income Housing Tax Credit (LIHTC) applicants to maximize the points provided in the Qualified Allocation Plan (QAP) in this category. The City has also identified two sources for HOME eligible activities:

- \$500,000 from HOME program income for affordable rental projects
- The 25% HOME Match requirement will be met using General Funds and local incentives.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Affordability of HOME funds shall be maintained by either the resale or recapture method as outlined in the HUD HOME Resale and Recovery Summary. A Note and Deed of Trust will be recorded to ensure the required period of affordability is met.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The City of Tucson and Pima County resale and recapture provisions are provided in Attachment 8.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

HOME funds will not be utilized in this manner.

Emergency Solutions Grant (ESG)

1. Include written standards for providing ESG assistance (may include as attachment)

Our policy manual for the Emergency Solutions Grants Program is attached as Appendix D. The Tucson-Pima County Collaboration to end Homelessness has adopted Continuum of Care Program Written Standards which are provided as Appendix E.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The Continuum of Care has begun a centralized/coordinated entry and assessment system consistent with HUD standards. Through the 25 Cities Initiative, a coordinated entry system is in place. Homeless service providers throughout Pima County utilize the Vulnerability Index and Service Prioritization Decision Assistance Tool (VI-SPDAT) as the common assessment tool for individuals who are homeless. The SPDAT is entered into the HMIS system by the agency completing it, and HMIS staff then matches the highest scoring client through their length of time homeless, their medical vulnerability, over all wellness, unsheltered sleeping location and age with the appropriate housing. Veterans with a high score are referred to the VASH program, and bridge housing through one of the VA programs with the next available housing that fits their needs.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The Tucson Pima Collaboration to End Homelessness (TPCH) has a workgroup that makes recommendations for ESG priorities.

Process for Sub-Awards: Funds will be awarded by the ESG Grantees on a competitive basis. The Request for Proposal Notice is released through the Continuum of Care as well as through the City Participation Process. The City of Tucson and Pima County jointly make the funding allocations. Members of the allocation committee are selected for their knowledge of services and participation in the Continuum. Every effort is made to involve a homeless or formerly homeless person in the process. The committee ranks the proposal individually and then reviews them as a committee and makes the final funding recommendations.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The Tucson Pima Collaboration to End Homeless (TPCH) has several former homeless persons on their governing board. TPCH assists with outlining priorities for ESG grants.

5. Describe performance standards for evaluating ESG.

Pima County and the City of Tucson in consultation with the Continuum of Care developed performance standards that provide measures to evaluate the effectiveness of

1. Targeting those who need the assistance the most
2. Reducing the number of people living on the streets and emergency shelters
3. Shortening the time people spend homeless
4. Reducing each program participant's housing barriers or housing stability risks

Does the action plan identify the method for selecting project sponsors (including providing full access to grassroots faith-based and other community organizations)? Note: Due to a system

The City of Tucson Housing and Community Development Department selects the Southern Arizona AIDS Foundation (SAAF) for its HOPWA program, as SAAF is the only organization in Tucson that specialized in providing HOPWA services.

SAAF is a community-based organization in Southern Arizona providing case management, housing, and support services for people living with HIV/AIDS and their families; comprehensive prevention and education programs to reduce the rate of infection; and trainings and opportunities for community members to fill critical roles. SAAF is a member of the Pima County HIV/AIDS Consortium and the Tucson Pima Collaboration to end Homelessness, the Continuum of Care for Tucson and Pima County.

SAAF as project sponsor, administer HOPWA Housing Subsidy Assistance in the form of Short-term Rent, Mortgage and Utility assistance (STRMU), Supportive Services (including case management and transportation), Emergency Shelter Vouchers (Short-term Supportive Facility) and Permanent Housing Placement Services (including move-in costs and housing prescreen assistance). The City of Tucson works through its Section 8 program as project sponsor to provide Tenant Based Rental Assistance (TBRA) with SAAF providing case management to those in the TBRA units.

Attachments

Citizen Participation Comments

City of Tucson FY 2019 (PY2018) Annual Action Plan

Citizen Participation Attachments

Attachment 1 – Legal Ad Affidavit of Publishing for Public Meetings and Public Comment Periods (English and Spanish), February 26, 2018, March 5, 2018, and May 7, 2018

Attachment 2 – Summary of March 13, 2018, and May 30, 2018 Public Meetings

Attachment 3 – Summary of public comments received during public comment periods March 12, 2018 to April 11, 2018, and May 11, 2018 to June 10, 2018, and City of Tucson/Pima County HOME survey results

Attachment 4 – Legal Ad Affidavit of Publishing for June 19, 2018, Mayor and Council public hearing

Attachment 5 – Summary of public comments received during the June 19, 2018, Mayor and Council public hearing, and Resolution No. 22887

Attachment 1 – Legal Ad Affidavit of Publishing for Public Meetings and Public Comment Periods (English and Spanish), February 26, 2018, March 5, 2018, and May 7, 2018

ARIZONA DAILY STAR

Tucson, Arizona

STATE OF ARIZONA)
COUNTY OF PIMA)

Debbie Freedle, being first duly sworn deposes and says: that she is the Advertising Representative of **TNI PARTNERS**, a General Partnership organized and existing under the laws of the State of Arizona, and that it prints and publishes the Arizona Daily Star, a daily newspaper printed and published in the City of Tucson, Pima County, State of Arizona, and having a general circulation in said City, County, State and elsewhere, and that the attached ad was printed and

Legal Notice

published correctly in the entire issue of the said Arizona Daily Star on each of the following dates, to-wit:

February 26, 2018

Debbie Freedle

Subscribed and sworn to before me this 26th day of

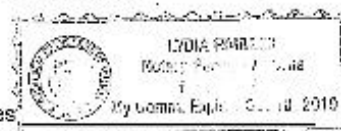
February 2018

Lidia Sumner

Notary Public

My commission expires

AD NO. 8772372



NOTICE OF PUBLIC MEETING AND PUBLIC COMMENT PERIOD

The City of Tucson and Pima County will provide a "Mid-Term" update of its current Five-Year (FY2018-2023) Consolidated Plan (Consolidated Plan) for public comment and input into its respective FY 2019 Citizen Participation Plan. The U.S. Department of Housing and Urban Development (HUD) requires both the City of Tucson and Pima County to update its joint Consolidated Plan via implementation of a separate 1-year Annual Action Plan (AAP). The Consolidated Plan outlines the needs, priorities and strategies for human services, including employment and training services, economic development, neighborhood revitalization, public facilities and infrastructure for the City of Tucson. In addition, affordable rental and owner housing, supportive services for special populations and homeless community and rural development program for Pima County. In all, the Consolidated Plan gives separate AAP processes to identify HUD-assisted activities for the City of Tucson, Housing and Community Development (HCD), and Pima County Department of Community Development and Neighborhood Cooperation (CENC), departments. The AAPs establish policies and goals for each jurisdiction and serve as the local government's application for HUD FY 2019 annual entitlement funding as follows:

The City of Tucson anticipates approximately \$4 million in HUD entitlement funding as follows:

- Community Development Block Grant (CDBG) funds - \$2,946,291
- Home Investments Partnerships (HOME) funds - \$2,474,855 (City Council Approval)
- Emergency Solutions Grant (ESG) funds - \$452,953
- Housing Opportunities for People with AIDS (HOPWA) funds - \$529,120

Pima County anticipates approximately \$3.5 million in HUD entitlement funding as follows:

- Community Development Block Grant (CDBG) funds - \$2,585,001
- Home Investments Partnerships (HOME) funds - \$785,233 (County Commission Approval)
- Emergency Solutions Grant (ESG) funds - \$129,766

funds - \$293,372

The projected funding levels contained in the FY 2019 Annual Action Plan will be forwarded to the City of Tucson Mayor & Council and Pima County Board of Supervisors for a final public hearing after a 30-day comment period beginning May 1, 2017.

A public meeting regarding the Consolidated Plan Mid-Term review and final public hearing for the City of Tucson and Pima County respective FY2019 Annual Action Plans will be held as follows:

Where: City of Tucson/Pima County Consolidated Plan Mid-Term Review & FY2019 Annual Action Plans Public Meeting
Date: March 13, 2018
Time: 4:00 P.M. to 6:00 P.M.
Location: City of Tucson Sentinel Building
320 North Commerce Park Loop
Tucson, AZ 85745
Contact: Glenn Meyer, City of Tucson (602) 526-8372 or glenn.meyer@tucsonaz.gov
Daniel Tytko, Pima County CDBG (520) 726-5754 or danielt@pima.gov

The draft City of Tucson FY 2019 Annual Action Plan will be posted on the HUD and Community Development Department website on the "What's New" web page available at: <http://cms3.tucsonaz.gov/whatsnew>. Beginning March 13, 2018, at which time physical copies will also be available at the Housing and Community Development Department. Comments will be accepted from March 13, 2018 to April 11, 2018 and may be submitted in person at the Public Meeting, via email at cdcomment@tucsonaz.gov or mailed/delivered to: Housing and Community Development Department, c/o Glenn Meyer, 320 North Commerce Park Loop, Tucson, AZ 85745. Please contact Glenn Meyer at 520-526-8372 or 520-791-2530 (TTY), by (5) business days in advance of the Public Meeting if an accommodation is required.

The draft Pima County FY 2019 Annual Action Plan will be available April 1, 2018 for review and comment at the Community Development and Neighborhood Cooperation Department located at 7707 F. A. Way, Tucson, Arizona and online at: <http://webcms.pima.gov/cms/one.aspx?portalid=169&pageid=12391>. Please forward comments to Jean Pella via email at jpella@pima.gov.

Publish February 25, 2018
Arizona Daily Star



ARIZONA DAILY STAR

Tucson, Arizona

STATE OF ARIZONA)
COUNTY OF PIMA;

Debbie Freedle, being first duly sworn deposes and says: that she is the Advertising Representative of **TNI PARTNERS**, a General Partnership organized and existing under the laws of the State of Arizona, and that it prints and publishes the Arizona Daily Star, a daily newspaper printed and published in the City of Tucson, Pima County, State of Arizona, and having a general circulation in said City, County, State and elsewhere, and that the attached ad was printed and

Legal Notice

published correctly in the entire issue of the said Arizona Daily Star on each of the following dates, to-wit:

February 26, 2018

Debbie Freedle

Subscribed and sworn to before me this 26th day of

February 2018

Lydia Martinez

Notary Public



My commission expires

AD NO. 8772397

ANUNCIO DE REUNIÓN PÚBLICA Y PERIODO DE COMENTARIOS DEL PÚBLICO

La Ciudad de Tucson y el Condado de Pima, proporcionalmente a la subvención de \$10 millones de parte de 22 agencias, Plan Consolidado (Plan Consolidado) de cinco años PY2016-2020 para comunidades e islas del pueblo del y el respectivo Plan de Participación de Ciudadanos PY 2019. El Departamento de la Vivienda y de Desarrollo Urbano de los Estados Unidos (HUD) requiere que tanto la Ciudad de Tucson como el Condado de Pima actualicen su Plan Consolidado y el Plan de Participación de Ciudadanos a favor de la implementación de los programas Planes de Acción Anual de 2019 (AAP). El Plan Consolidado asegura las necesidades, prioridades y estrategias de las secciones urbanas, incluyendo el empleo y los apoyos de capacitación, desarrollo, rehabilitación de viviendas, relaciones y transacciones públicas de la Ciudad de Tucson además de, salud comunitaria y viviendas de propietarios; servicios de ayuda a grupos de población especiales y a personas sin hogar; programas de desarrollo rural y de la comunidad del Condado de Pima. En conjunto, el Plan Consolidado impulsa proyectos AAP, apoyados para fortalecer las actividades financiadas por HUD para los departamentos de la vivienda y de Desarrollo Urbano (DUI) de la Ciudad de Tucson y de Desarrollo de Comunidad y Conservación de Vecindarios del Condado de Pima (DCCV). Los AAP establecen políticas y objetivos para cada jurisdicción y sirven como la aplicación de los gobiernos locales para la financiación de subvención anual PY 2019 de HUD de la siguiente forma:

La Ciudad de Tucson anticipa aproximadamente \$5 millones en financiación de subvención de HUD de la siguiente forma:

Fondos de Subvención para Desarrollo de la Comunidad (CDBG) - \$4,986,291

Fondos para Asociaciones para Invernaleros en Hogares (HOME) - \$2,471,685 (Cantidad del Condado Municipal)

Fondos de Subvención para Soluciones de Emergencia (ESG) - \$462,325

Fondos para Oportunidades de Vivienda para personas sin hogar (HOME) - \$522,320

El Condado de Pima anticipa aproximadamente \$5 millones en financiación de subvención de HUD de la siguiente forma:

Fondos de Subvención para Desarrollo de la Comunidad (CDBG) - \$2,289,691

Fondos para Asociaciones para Invernaleros en Hogares (HOME) - \$785,233 (Cantidad del Condado del Condado)

Fondos de Subvención para Soluciones de Emergencia (ESG) - \$231,912

Los niveles de financiación proyectados para los Planes de Acción Anual PY 2019 serán enviados al alcalde y al consejo de la Ciudad de Tucson y al Junta de Supervisores del Condado de Pima para una audiencia pública final después de un periodo de comentarios de 30 días que comienza el 19 de mayo del 2017.

Se celebrará una reunión pública relativa a la revisión a mitad de año del Plan Consolidado y el Plan de Participación de Ciudadanos.

Continued...

conjunto para los respectivos Planes de Acción Anual PY2019 de la Ciudad de Tucson y del Condado de Pima como sigue:

Que: Revisión de mitad de año del Plan Consolidado de la Ciudad de Tucson y del Condado de Pima y Reunión Pública de los Planes de Acción Anual PY2019
Fecha: 13 de marzo del 2018
Hora: 4:00 de la tarde a 6:00 de la tarde
Ubicación: Edificio Sanfina de la Ciudad de Tucson
330 North Chasler Park Loop
Tucson AZ, 85745
Contacto: Glenn Meyer, City of Tucson HCD
320-837-6422 o glenn.meyer@tucsonaz.gov
Daniel Tybirk, Pima County DDC
520.724-6754 o daniel.tybirk@pima.gov

El borrador del Plan de Acción Anual PY 2019 de la Ciudad de Tucson estará publicado en el sitio web del Departamento de la Vivienda y de Desarrollo Urbano en la página "What's New" (Qué es nuevo) disponible en: tucson.gov/what-what-new a partir del 12 de marzo del 2018. En ese momento habrá también disponibles copias en papel en el Departamento de la Vivienda y de Desarrollo Urbano. Se aceptarán comentarios desde el 12 de marzo del 2018 hasta el 31 de abril del 2018, que pueden ser presentados personalmente en la Reunión Pública, por email en HUDcomm@tucsonaz.gov o en tybirk@pima.gov por correo electrónico. Housing and Community Development Department, c/o Glenn Meyer, 330 North Chasler Park Loop, Tucson, AZ 85745. For more information contact our office at 520-837-6422 x 500-701-2638 (TTY), cinco (5) días hábiles antes de la Reunión Pública o tiene alguna necesidad especial.

El borrador del Plan de Acción Anual PY 2019 del Condado de Pima estará disponible el 19 de abril del 2018 para ser revisado y comentado en el Departamento de Desarrollo de la Comunidad y Conservación de Vecindarios del Condado de Pima ubicado en 2707 E. Al Way, Tucson, Arizona, en línea en: <http://webcam.pima.gov/cmc/one.asp> y en línea en tybirk@pima.gov. Por favor envíe los comentarios a Jera Tels por email en jeratels@pima.gov.

Published February 26, 2018
Arizona Daily Star



ARIZONA DAILY STAR

Tucson, Arizona

STATE OF ARIZONA)
COUNTY OF PIMA)

Debbie Freedle, being first duly sworn deposes and says: that she is the Advertising Representative of INI PARTNERS, a General Partnership organized and existing under the laws of the State of Arizona, and that it prints and publishes the Arizona Daily Star, a daily newspaper printed and published in the City of Tucson, Pima County, State of Arizona, and having a general circulation in said City, County, State and elsewhere, and that the attached ad was printed and

Legal Notice

published correctly in the entire issue of the said Arizona Daily Star on each of the following dates, to-wit:

MARCH 5, 2018

Debbie Freedle

Subscribed and sworn to before me this 14th day of

March 2018

Lydia Fimbres

Notary Public

My commission expires



AD NO. 8776006

NOTICE OF PUBLIC MEETING AND PUBLIC COMMENT PERIOD

The City of Tucson and Pima County will provide a "Web-Cast" update of its current Five Year 2016-2020 Consolidated Plan (Consolidated Plan) for public comment and input to its respective FY 2019 Action Plan. The U.S. Department of Housing and Urban Development (HUD) requires both the City of Tucson and Pima County to update its Joint Consolidated Plan via implementation of separate 1-Year Annual Action Plans. The Consolidated Plan outlines the needs, priorities and strategies for human services, including employment and training supports; economic development; neighborhood revitalization; public facilities and infrastructure for the City of Tucson; in addition to affordable rental and owner housing; supportive services for special populations and homeless; community and area development programs for Pima County. In all, the Consolidated Plan shows separate AAP priorities to identify HUD-funded activities for the City of Tucson Housing and Community Development (HCD) and Pima County Department of Community Development and Neighborhood Conservation (CDNC) departments. The AAP's establishes policies and goals for each jurisdiction and serves as the local government's application for HUD FY 2019 annual entitlement funding as follows:

The City of Tucson anticipates approximately \$8 million in HUD entitlement funding as follows:

Community Development Block Grant (CDBG) funds - \$4,986,291

Home Investment Partnerships (HOME) funds - \$3,474,585 (City Consortium Amount)

Emergency Solutions Grant (ESG) funds - \$452,351

Housing Opportunities for People with AIDS (HOPWA) funds - \$234,326

Pima County estimates approximately \$3.5 million in HUD entitlement funding as follows:

Community Development Block Grant (CDBG) funds - \$2,629,361

Home Investment Partnerships (HOME) funds - \$735,233 (County Consortium Amount)

Emergency Solutions Grant (ESG) funds - \$231,212

A public hearing regarding the Consolidated Plan Mid-Year review and public notice for the City of Tucson and Pima County respective FY2019 Annual Action Plans will be held as follows:

What: City of Tucson/Pima County Consolidated Plan Mid-Year Review & FY2019 Annual Action Plans Public Meeting

Date: March 13, 2018

Time: 4:00 P. M. to 6:00 P. M.

Location: City of Tucson
Suffolk Building
320 North Commerce Park Loop
Tucson AZ, 85745

Contact: Glenn Moyer,
City of Tucson HCD
520-837-5422 or
glenn.moyer@tucsonaz.gov
Daniel Tishler, Pima County
CDNC
520-734-6754 or
daniel.tishler@pima.gov

The draft City of Tucson FY 2019 Annual Action Plan will be posted on the Housing and Community Development Department website on the "What's New" web page available at: <http://hcd.org>. Comments will be accepted from March 12, 2018 to April 31, 2018 and may be submitted in person at the Public Meeting, via email at CDNC@pima.gov or mailed/delivered to: Housing and Community Development Department, c/o Glenn Moyer, 310 North Commerce Park Loop, Tucson, AZ 85745. Please contact Glenn Moyer at 520-837-5422 or 520-791-2639 (TVA) five (5) business days in advance of the Public Meeting if an accommodation is required.

The draft Pima County FY 2019 Annual Action Plan will be available April 1, 2018 for review and comment at the Community Development and Neighborhood Conservation Department located at 2797 E. Rio Way, Tucson, Arizona and online at: <http://hcd.pima.gov>. Comments may be submitted via email at cdnc@pima.gov. Please forward comments to: Jene Feltz via email at jene.feltz@pima.gov.



Published March 5, 2018
Arizona Daily Star

Tucson, Arizona

STATE OF ARIZONA)
COUNTY OF PIMA)

Debbie Freedle, being first duly sworn deposes and says that she is the Advertising Representative of TNI PARTNERS, a General Partnership organized and existing under the laws of the State of Arizona, and that it prints and publishes the Arizona Daily Star, a daily newspaper printed and published in the City of Tucson, Pima County, State of Arizona and having a general circulation in said City, County, State and elsewhere, and that the attached ad was printed and

Legal Notice

published correctly in the entire issue of the said Arizona Daily Star on each of the following dates, to-wit:

MARCH 5, 2018

Debra Frede

Subscribed and sworn to before me this 14th day of March 2018

Sydney Summers
Notary Public

Notary Public



My commission expires

AD NO. 8775102

**ANUNCIO DE
REUNION PUBLICA y
PERIODO DE
COMENTARIOS DEL
PUBLICO**

[illegible]

La Ciudad de Tucson anticipa aproximadamente \$4 millones en transacción de subsidio de HUD de la siguiente forma:

Fondos de Subvención para
Desarrollo de la Comunidad
(CIBR) - \$4,996,291

Fuente: para el Ayuntamiento de Madrid
 (1990) - 32,474.885 (Cantidad
 de Concesión Municipal)

Fondos de Salvación para
Sociedades de Emergencia
(ESG) - \$452,951

Fondos para Oportunidades de
Vivenda para pessoas com
SIDA (HOPWA): \$520,326

El Condado de Pima calcula aproximadamente \$8 millones en transacciones de subsidio de HUD de la siguiente forma:

Fondos de Salvación para
Desarrollo de la Comunidad
(CDSG) - \$2.385.000

Fondos para Asociaciones para Inversiones en Hogares (FOHE) - \$705,233 (Cantidad de: Consorcio del Concelho)

Fondos de Subvención para
Solicitudes de Emergencia
(ESGI) - \$233,377

Se celebró una reunión pública relativa a la revisión a mitad de año del Plan Consorcio y sus actividades conjuntas para los respectivos Planes de Acción Anual P2021 de la Ciudad de Tucson y del Condado de Pima como sigue:

Qué: División de mitad de curso del Plan Censurado de la Ciudad de Tucson y de la Ciudad de Pima y Consejo pública de las Planes de Acción.

Fecha: 13 de marzo del 2013
Hora: 4:00 de la tarde a 5:00 de la tarde

Uteclab participa
Sentinel de la Ciudad de
Tucson 320 North Commercial
Park Loop Tucson AZ 85705

CONTACTS: Glenn Meyer,
City of Tucson HCD
620-837-5422 o
glenn.meyer@tucsonaz.gov
Dante Tyfutti, Pima Count
CDNC 620-729-4754 o
dante.tyfutti@pima.gov

El borrador de Plan de Acción Anual PA 2019 de la Ciudad de Tucson está publicado en el sitio Web del Departamento de la Oficina de la Política y de la Acción Urbana en el portal www.ci.tucson.az.gov.
New! ¡Todas las acciones disponibles en <http://www.ci.tucson.az.gov/hcdocumentos>! Ahora es posible encontrar el PA 2019, en cuyo momento también se encuentran los planes de acción de los departamentos de la Ciudad de Tucson y el desarrollo urbano. Se aceptan comentarios desde el 22 de febrero del 2018 hasta el 11 de abril del 2018, que pueden ser enviados a ci@ci.tucson.az.gov o a la Redacción Pública, por correo electrónico HCDocumentos@ci.tucson.az.gov o telefónicamente al 520-791-5472.
Development Director: Joe C. Giannini
City Manager: Joe C. Giannini
City Clerk: Joe C. Giannini
City Attorney: Joe C. Giannini
City Treasurer: Joe C. Giannini
City Auditor: Joe C. Giannini
City Engineer: Joe C. Giannini
City Planner: Joe C. Giannini
City Administrator: Joe C. Giannini
City Manager: Joe C. Giannini
City Clerk: Joe C. Giannini
City Attorney: Joe C. Giannini
City Treasurer: Joe C. Giannini
City Auditor: Joe C. Giannini
City Engineer: Joe C. Giannini
City Planner: Joe C. Giannini
City Administrator: Joe C. Giannini

El borrador del Plan de Gestión Anual FY 2019 del Círculo de Pima estará disponible el 16 de junio del 2018, para ser revisado y comentado por el Ayuntamiento de Desaguadero de la Libertad y Conservación de Vida Silvestre del Condado de Pima ubicado en el 2197 E. Aliso Way, Tucson, Arizona y al correo: info@ciudadepima.gov o al teléfono: (520) 798-1988. Para favor enviar los comentarios a: jean.felix@ciudadepima.gov o jennifer.felix@ciudadepima.gov.



Publish March 5, 2018
Arizona Daily Star

ARIZONA DAILY STAR

Tucson, Arizona

STATE OF ARIZONA)
COUNTY OF PIMA)

Dobbie Freddie, being first duly sworn deposes and says: that she is the Advertising Representative of **TNI PARTNERS**, a General Partnership organized and existing under the laws of the State of Arizona, and that it prints and publishes the Arizona Daily Star, a daily newspaper printed and published in the City of Tucson, Pima County, State of Arizona, and having a general circulation in said City, County, State and elsewhere, and that the attached ad was printed and

Legal Notice

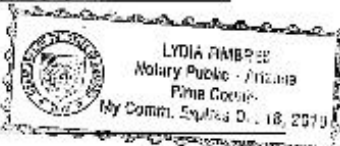
published correctly in the entire issue of the said Arizona Daily Star on each of the following dates, to-wit:

MAY 7, 2018

Dobbie Freddie

Subscribed and sworn to before me this 14th day of May 2018

Lydia Ramirez
Notary Public



My commission expires

AD NO. 8793183

NOTICE OF PUBLIC MEETING and PUBLIC COMMENT PERIOD

The City of Tucson will hold a public meeting to gather public input for the City of Tucson FY 2019 Annual Action Plan.

What: City of Tucson FY 2019 Annual Action Plan
Public Meeting
Date: May 10, 2018
Time: 4:00 P.M. to 8:00 P.M.
Location: City of Tucson, Sentinel Building, 320 North Commerce Park Loop, Tucson, AZ 85745.
Contact: Glenn Meyer, City of Tucson HCD, 520-897-5422 or glenn.meyer@tucsonaz.gov

The Annual Action Plan establishes policies and goals and serves as the City's blueprint for Housing and Urban Development (HUD) Department annual budget funding. The City of Tucson anticipates approximately \$10 million in HUD employment funding as follows:

Community Development Block Grant (CDBG) funds - \$5,500,000

Home Investment Partnerships (HOME) funds - \$5,500,000
Continuation Amount

Emergency Solutions Grant (ESG) funds - \$4,499,000

Housing Opportunities for People with AIDS (HOPWA) funds - \$500,000

Public comments will be accepted from May 11, 2018 to June 10, 2018.

Public comments may be submitted in person at the Public Meeting via email at HCDcomment@tucsonaz.gov.

Comments should be mailed to: Housing and Community Development Department, c/o Glenn Meyer, 310 North Commerce Park Loop, Tucson, AZ 85745.

The draft City of Tucson FY 2019 Annual Action Plan will be posted on the Housing and Community Development Department website on the "2018's New" webpage available at www.tucsonaz.gov/hcd/whats-new beginning May 11, 2018. At which time physical copies will also be available at the Housing and Community Development Department. Please contact Glenn Meyer at 520-897-5422 or 520-791-2630 (TTY) five (5) business days in advance of the Public Meeting if an accommodation is required.

The FY 2019 Annual Action Plan will be forwarded to the City of Tucson Mayor & Council for a final public hearing June 10, 2018.



Published May 7, 2018
Arizona Daily Star

Tucson, Arizona

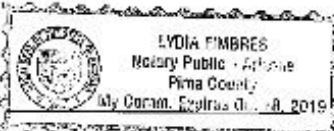
Dobbie Froese, being first duly sworn deposes and says: that she is the Advertising Representative of **TNI PARTNERS**, a General Partnership organized and existing under the laws of the State of Arizona, and that it prints and publishes the Arizona Daily Star, a daily newspaper printed and published in the City of Tucson, Pima County, State of Arizona, and having a general circulation in said City, County, State and elsewhere, and that the attached ad was printed and

published correctly in the entire issue of the said Arizona Daily Star on each of the following dates, to-wit:

MAY 7, 2018
Debra Freddo

May 2018

Sydney Lumber



AD NO. 8793226

Published May 7, 2018
Arizona Daily Star

Attachment 2 – Summary of March 13, 2018, and May 30, 2018 Public Meetings

**Summary of Public Meeting
FY2019 Annual Action Plan and Proposed Amendments
City of Tucson 2015-2019 Five-Year Consolidated Plan**

Tuesday, March 13, 2018 4:00 p.m.
Community Resource Center
320 N. Commerce Park Loop
Sentinel Building, Rillito-Sabino Conference Rooms (1st Floor)

Meeting Notes

Call to Order and Introductions – 4:02 P. M.

Agenda

- I.** Glenn Moyer -Welcome and Purpose of Meeting

Presented Annual Plan and Consolidated Planning Process Summary
Year Four of the Annual Action Plan (2019)
CAPER-Two years have been submitted under this plan. Next CAPER will be submitted in the fall.
- II.** Adopted 5-Year Consolidated Plan and Goals and Priorities
The City of Tucson (COT) has a 5 year cumulative plan. This is year Four of the five-year program. Jodie Barnes presented plans and goals to accomplish and priorities. Contracts will have limits.
Agencies will have amendments to contracts. There will be a Request for Proposal for contracts in the fall of 2018. Funding is dependent upon Federal Budget
- III.** Timeline for the Annual Action Plan
Draft Plan and 30 day Public Comment Period March 12, 2018
Public Meeting March 13, 2018
Mayor and Council Meeting April 17, 2018
HCD Submits the FY 2019 Annual Action Plan to HUD for Review and Approval no later than May 1, 2018
- IV.** Funding for FY 2019–Presented slides of the City of Tucson Funding
Community Development Block Grant (CDBG)
Home investments Partnerships (HOME)
Emergency Solutions Grant Funds (ESG)
Housing Opportunities for People with AIDS (HOPWA)
Annual Action Plan Goal Summary

GM/bc 3.23

V. Discussion Regarding Un-Met Needs

- ❖ There were twenty eight attendees at this meeting.
- ❖ There were eight attendees that commented.
- ❖ Handouts were provided for additional comments.
- ❖ Handouts were provided for public with information on the five-year plan.
- ❖ Interpreters were provided for spanish speaking guests.

Invitation for comments—

Comments from the speakers:

1. Scott Coverdale– Community Home Repair

- Low Income homeowners have unmet needs-acute needs
- CDBG (Community Development Block Grant) has been a mainstay of funding through the city and county
- Struggling with dollars from the City-too many restrictions on the funding and cannot serve the community very well. Need a solution to the issue
- HRC (Housing Rehab Collaborative) only has 2 programs now, down from several programs
- Programs are defined narrowly-intimidating to clients they are supposed to serve (whole house rehab and accessibility program)
- Consulting process is important-not consulting service delivery agents
- HCD Management not taking advantage of collective wisdom of agencies
- Input from public is important and HCD management staff is not listening to comments
- Two year contracts are good

2. Vicki Cusino – Direct Center for Independence

- Concerned with serving and meeting the needs of underserved individuals
- Funding is not the same as previous years
- HRC (Housing Rehab Collaborative) not operating with the same agencies as previous years
- Approved Annual Action Plan is not operating as approved
- What programs are in place will not achieve Annual Action Plan goals
- City should be open to suggestions from community partners for creative solutions, trust agency/partner expertise
- Recommend COT take some risk and follow up on the comments from this meeting

3. Pete Chalupsky–Community Development Partners

- Need is greater than what we can do
- Immediate demand for TOD in Tucson
- How can we leverage funds
- Fair housing opportunities vs where housing is-geographically speaking
- There needs to be a jobs and housing balance
- Model a pay for performance similar to Pima County

GM/bc 3.23

4. Mike McDonald–Community Food Bank

- Awareness of the Pima County 5 year County Health Improvement Plan- it is out of sync with the City's Plan
- Need leverage and funding and partnerships
- "Food Deserts"-lack of access to transit, poor health
- Social determinant's such as lack of transportation and poor economic development contribute to poor diets
- 80% healthcare cost which is outside of clinics-related to poor housing or accessibility to food

5. Debra Adams – Pima Council on Aging

- Aging community forgotten
- Need age friendly community
- Older adults live in older homes, have a need for independence. Funding needed and to be able to keep these folks in their homes as long as possible
- How do we address these issues?
- Work with TC3 involvement (TFD)-work with special populations groups
- Work together as a community
- Support for home care services, food, nutrition and human services

6. Marcos Ysmael – Pima County Housing

- Reward for investors such as tax credits
- Pay for performance is a difficult model to work with-committed resources for this program
- Commit resources so you can divert persons from prison to homes- saves money in health care and medical services costs

7. Brooke Newark – TMM

- Commend City of Tucson and Pima County Collaboration on senior housing by allowing 2 bedroom/2 bath for seniors to have a caretaker live with them

8. Sarah Launius – COT Ward 3

- Ward 3 will be looking at Annual Action Plan with interest
- Ward 3 welcomes suggestions from community
- Sarah Launius is point of contact (520) 791-4711 or contact by email

9. Margaret Kish – Pima County

- Two year contracts for agencies with Pima County and two year contracts with City of Tucson should be offsetting for CDBC funding so agencies are always being served

Comment forms may be found on the City of Tucson website. Comments will be reviewed.

GM/bc 3.23

Daniel Tyutki from Pima County presented the City of Tucson and Pima County FY 2015–2020 Consolidated Plan Mid -Term Review

I. Adjournment – 5:40 P.M.

City of Tucson Staff remained available until 6:00 P.M. for any late arrivals or anyone wishing to make or add comments.

GM/bc 3.23



City of Tucson Department of Housing and Community Development (HCD) Sign In Sheet
 March 13, 2018 Public Meeting, 4:00 PM, 320 N Commerce Park Loop, Tucson, AZ 85745
 DRAFT FY2019 Annual Action Plan City of Tucson 2015-2019 Five Year Consolidated Plan



NAME	ORGANIZATION	CONTACT INFORMATION/ EMAIL	REQUEST TO SPEAK	NUMBER
1. <i>Paul Bouchae</i>	<i>Directile</i>	<i>gaibedirectile.org</i>		
2. <i>Tom Lowicki</i>	<i>OPCS</i>	<i>flitwicki@helptucson.org</i>		
3. <i>Michael McDermott</i>	<i>Community Food Bank</i>	<i>mmd@mcfb.org</i>		
4. <i>JEFF HESSENIUS</i>	<i>SAAVI</i>	<i>jhesenius@saavi.us</i>		
5. <i>GLENN MOYER</i>	<i>COT/HCD</i>	<i>GLENN.MOYER@TUCSONAR.GOV</i>		
6. <i>Rebecca Chavez</i>	<i>COT/HCD</i>	<i>Rebecca.Chavez@tucsonaz.gov</i>		
7. <i>GORDON YARRINGTON</i>	<i>HABITAT FOR HUMANITY</i>	<i>Gordon.Yarrington@habitat-tucson.org</i>		
8. <i>John Campbell</i>	<i>Burns Neighborhood Assoc.</i>	<i>john.campbell@burnsassoc.org</i>		
9. <i>Alexander K. Hansen</i>	<i>Community Center for the Elderly</i>	<i>alex.hansen@communitycenterfortheelderly.org</i>		
10. <i>Daniel Tyburti</i>	<i>Pima C. CDC</i>	<i>dtb@pima.gov</i>		
11. <i>David Prioletti</i>	<i>Direct ILC</i>	<i>david@directile.org</i>		
12. <i>Adam Cruz</i>	<i>Direct ILC</i>	<i>adam@directile.org</i>		
13. <i>Vicki Casino</i>	<i>Direct ILC</i>	<i>vicki@directile.org</i>		
14. <i>Jodie Barnes</i>	<i>COT</i>			
15. <i>SUSAN CERDA</i>	<i>COT</i>	<i>SUSAN.CERDA@pima.gov</i>		
16. <i>PETE CHALUPSKY</i>	<i>COP</i>	<i>pete@cdphousing.com</i>		



City of Tucson Department of Housing and Community Development (HCD) Sign In Sheet
 March 13, 2018 Public Meeting, 4:00 PM, 320 N Commerce Park Loop, Tucson, AZ 85745
 DRAFT FY2019 Annual Action Plan City of Tucson 2015-2019 Five Year Consolidated Plan



NAME	ORGANIZATION	CONTACT INFORMATION/ EMAIL	REQUEST TO SPEAK	NUMBER
17	Joyce Alexander	PCHD		
18	Brooke Novak	TMM Fam.		
19	Shirley Robles	TMM		
20	Carrie Nelson	CHRA		
21	Abi Osborne	CHRA		
22	Scott Corcoran	CHRA		
23	Karen Salcido	Housing Center		
24	Arstina Vaca	SAHF		
25	Debra Adams	PCOA		
26	Marcos Ysmael	Pima County Housing		
27	Sarah Lannius	Ward 3		
28	Jennifer Felix	Pima Co.		
29				
30				
31				
32				

**Summary of Public Meeting
FY2019 Annual Action Plan and Proposed Amendments
City of Tucson 2015-2019 Five-Year Consolidated Plan
2nd Meeting due to Funding Increase**

Thursday, May 30, 2018 4:00 p.m.
Community Resource Center
320 N. Commerce Park Loop
Sentinel Building, Rillito-Sabino Conference Rooms (1st Floor)
Meeting Notes

Call to Order and Introductions – 4:00 P. M.

Agenda

- I.** Glenn Moyer -Welcome and Purpose of Meeting

Presented Annual Plan and Consolidated Planning Process Summary and Objectives
Year Four of the Annual Action Plan (2019)
This is the second AAP Meeting due to funding increase of programs.

- II.** Adopted 5-Year Consolidated Plan and Goals and Priorities
The City of Tucson (COT) has a 5 year cumulative plan. This is year Four of the
five-year program.
Jodie Barnes presented Human Services plans and goals to accomplish priorities.
There will be a Request for Proposal for contracts in the fall of 2018.

- III.** Timeline for the Annual Action Plan
Draft Plan and 30 day Public Comment Period June 30, 2018
Prior Public Meeting March 13, 2018
HCD Submits the FY 2019 Annual Action Plan to HUD for Review and Approval no later than May 1, 2018
- IV.** Funding for FY 2019 - Presented slides of the City of Tucson Funding
Community Development Block Grant (CDBG) 12% increase in funding
Home Investments Partnerships (HOME) 42% increase in funding
Emergency Solutions Grant Funds (ESG) 1% decrease in funding
Housing Opportunities for People with AIDS (HOPWA) 11% increase in funding
Annual Action Plan Goal Summary
- V.** Discussion Regarding Un-Met Needs
- ❖ There were thirteen attendees at this meeting.
 - ❖ There were eight attendees that commented.
 - ❖ Agenda and Handouts were provided for additional comments.
 - ❖ Handouts were provided for public with information on the five-year plan.
 - ❖ Interpreters were provided for Spanish speaking guests.

Invitation for comments—captured on comments form.

GM/bc



PUBLIC MEETING - FY 2019 ANNUAL PLAN

May 30, 2018 @ 4:00 P. M.

320 N. Commerce Park Loop, Tucson

Sentinel Building (Disabled Accessible), Tucson, Arizona 85745

GLENN MOYER - COT-HCD 520-837-5422 GLENN.MOYER@TUCSON.AZ.GOV

Name	Organization	Telephone	E Mail
Billy Schwan	Gorman & Co	480-685-8805	bschwan@gormanusa.com
Martha Beecham	Compass Affordable Housing	520-337-4001	mbeecham@compassaffordablehousing.org
Laure Hozabo	Our Family	323-1708	lnazembo@ourfamily-services.org
Zachary Kent	Metro Park Neighborhood Assoc.	520-401-1305	zyentzer@gmail.com
Sarah Harris	Feldman's N.A.	882-4577	sarah.feldman@feldmansaz.org
Terry Galligan	OPCS	445-7089	tgalligan@help4usm.org
Ray Gahris	COT	857-5336	RayGahris@tucsonaz.gov
Jodie Bantz	COT	-	-
George Kuck	Flowing Wells Neighbors Assoc. + Community Coalition	520-471-6408	george5356@hotmail.com
JEFF KALLEK	THE SAVIOUR'S LUTHERAN CHURCH	520-320-3634	PASTORJEFF@LUTHERAN.TUCSON.AZ.GOV
Joyce Alcala	COT/HCO/POD	25324	joyce.alcala@tucsonaz.gov

Sarah Launius Ward 3 SarahLaunius@tucsonaz.gov
 Celine Hughes Catalina Vista WA celinehughes@cox.net

Attachment 3 – Summary of public comments received during public comment periods March 12, 2018 to April 11, 2018, and May 11, 2018 to June 10, 2018, and City of Tucson/Pima County HOME survey results

Attachment 3 – Public Comments

FY 2019 Annual Action Plan

March 13-April 12, 2018 Public Comments

March 13, 2018 Public Meeting Comments

	Comment Type-Meeting	Comments Received	Response
1	Public Meeting Comment Name: Scott Coverdale Community Home Repair	<ul style="list-style-type: none"> • Low Income homeowners have unmet needs • CDBG (Community Development Block Grant) has been a mainstay of funding through the city and county • Struggling with dollars from the City-too many restrictions on the funding and cannot serve the community very well. Need a solution to the issue • HRC (Housing Rehab Collaborative) only has 2 programs now, down from several programs • Programs are defined narrowly-intimidating to clients they are supposed to serve (whole house rehab and accessibility program) • Consulting process is important-not consulting service delivery agents • HCD Management not taking advantage of collective wisdom of agencies • Input from public is important and HCD management staff is not listening to comments • Two year contracts are good 	<p>The Housing and Community Development (HCD) Department is currently in the process of Revising the Whole House Rehabilitation Program to improve community and staff acceptance of the program including removing cost barriers for our clients and simplifying administration of the program for agencies and staff.</p> <p>Proposed changes include adding a preference for homeowners that have been previously vetted through the General Fund Acute Emergency Home Repair Program. This will allow the applicant's acute needs to be addressed quickly with more flexible General Funds and prioritize longer term needs that can be better addressed through more restrictive CDBG funds.</p>

1

	Comment Type-Meeting	Comments Received	Response
2	Public Meeting Comment Name: Vicki Cusino Direct Center for Independence	<ul style="list-style-type: none"> Concerned with serving and meeting the needs of underserved individuals Funding is not the same as previous years HRC (Housing Rehab Collaborative) not operating with the same agencies as previous years Approved Annual Action Plan is not operating as approved What programs are in place will not achieve Annual Action Plan goals City should be open to suggestions from community partners for creative solutions Recommend COT take some risk and follow up 	During the last RFP for the City of Tucson residential rehab programs, all funding that was applied for was awarded. Only three HRC members submitted proposals.
3	Public Meeting Comment Name: Pete Chalupsky Community Development Partners	<ul style="list-style-type: none"> Need is greater than what we can do Immediate demand for TOD in Tucson How can we leverage funds Fair housing opportunities vs where housing is-geographically speaking There needs to be a jobs and housing balance Pay for performance like Pima County 	The Arizona Department of Housing (ADOH) Qualified Allocation Plan (QAP) previously included points for proposed low-income rental development projects near mass transit. This resulted in several projects along the streetcar route. This year that category was removed. Suggest a discussion with ADOH to reconsider the mass transit scoring criteria.
4	Public Meeting Comment Name: Mike McDonald Community Food Bank	<ul style="list-style-type: none"> Awareness of the Pima County 5 year County Health Improvement Plan- it is out of sync with the City's Plan Need leverage and funding and partnerships "Food Deserts"-lack of access to transit, poor health Social determinant's such as lack of transportation and poor economic development contribute to poor diets 80% healthcare cost which is outside of clinics-related to poor housing or accessibility to food 	The City recognizes and encourages leveraging of federal funds with funding from other sources. Housing and Community Development has identified opportunities to partner with organizations like Felicia's Farm to address food deserts especially in neighborhoods with public housing.

	Comment Type-Meeting	Comments Received	Response
5	Public Meeting Comment Name: Debra Adams Pima Council on Aging	<ul style="list-style-type: none"> • Aging community forgotten • Need age friendly community • Older adults live in older homes, have a need for independence. Funding needed and to be able to keep these folks in their homes as long as possible • How do we address these issues? • Work with TC3 involvement (TFD)-work with special populations groups • Work together as a community • Support for home care services, food, nutrition and human services 	The next request for proposals (RFP) for the City of Tucson Human Services programs will require applicants to consider the eight AARP Age-Friendly Communities Domains of Livability their proposals.
6	Public Meeting Comment Name: Marcos Ysmael Pima County Housing	<ul style="list-style-type: none"> • Reward for investors such as tax credits • Pay for performance is a difficult model to work with • Commit resources so you can divert persons from prison to homes- saves money in health costs 	The City of Tucson is supporting Pima County's Housing First Homeless Program (the successor to the County's Pay for Success Pilot) by providing up to 250 Housing Choice (Section 8) Vouchers to help stabilize formerly incarcerated persons and lower community health costs.
7	Public Meeting Comment Name: Brook Newark TMM	<ul style="list-style-type: none"> • Commend City of Tucson and County Collaboration on senior housing • Allowing 2 bedroom/2 bath for seniors to have a caretaker live with them 	Storacle Point, a scattered site low income rental development that is currently under development, as well as low income rental units being developed by the Southern Arizona Land Trust (SALT) include three and four bedroom units that are handicap accessible allowing multigenerational families with handicapped member to remain together.
8	Public Meeting Comment Name: Sarah Launius Ward 3	<ul style="list-style-type: none"> • Ward 3 will be looking at Annual Action Plan with interest • Ward 3 welcomes suggestions form community • Sarah Launius is point of contact 	Acknowledged.

	Comment Type-Form	Comments Received	Response
9	<p>Comment-Form Name: Joanne Campbell Barrio Hollywood Neighborhood Assn</p>	<ul style="list-style-type: none"> • Looking for resources in partnering up with HUD to beautify and clean up Barrio, i.e. • enforcement of removing abandoned vehicles and people living in cars • vacant houses-refurbishing and removing • Safety, street clean ups, public garden • Resources for elderly to improve home (repairs) • Meetings are 1st Thursday of every month at El Rio Center at 6 p.m. 	<p>The City of Tucson's Code Enforcement Division is responsible for enforcing property maintenance codes throughout the City of Tucson. These codes ensure owners maintain their property which helps to protect citizens' health, safety and welfare. Home rehabilitation programs (Whole Rehabilitation and Home Access Program) include a preference for elderly and handicapped homeowners.</p>
		-Continued-	
10	<p>Emailed Comment Name: Scott Coverdale Community Home Repair Projects of Arizona</p>	<p>What the city HCD is calling "Whole Home Rehab" is, in my studied opinion, a travesty. It is travesty not because I don't like houses to be thoroughly rehabilitated. It is a travesty because it is happening (or supposed to be happening) at the exclusion of what has been known as repair and rehab work.</p> <p>At Community Home Repair, we have an especially good vantage point from which to understand the needs of low-income homeowners. We go into about 1800 homes per year and carry out emergency repairs, rehab and adaptive safety projects. We receive dozens of calls every day from people seeking assistance with their homes. Requests range from simple cooler repairs, to new gas or water supply, roof replacements, electrical</p>	<p>In FY 2018 the low income home-owner rehabilitation program was retooled to use limited resources more efficiently, better reach those in need, and achieve financial sustainability. The programs give preference to the elderly and disabled. Housing and Community Development is actively evaluating its low-income home rehabilitation programs before a decision is made to extend or adjust the programs for FY 2019. At the same time the City of Tucson General Fund has been used to address acute emergency home repair needs and this program will continue in FY 2019.</p>

	<p>service, sewer lines and structural repairs.</p> <p>Today, we received a call from a city resident who received a letter from TEP saying that her point of connection and riser conductors are damaged and she'll need this replaced or they'll have to cut power by March 30th. This Tucsonan is a single mom with 4 kids, and her income is about \$400 a week from her full-time job. She is not a candidate for whole house rehab—she just wants to keep her electricity on. We assessed the situation this afternoon. There has been some fairly hazardous cowboy wiring done at her home, and her service panel will have to be replaced. We could do this job for her before March 30th.</p> <p>Here are four other jobs that came to my desk today:</p> <p>☒ Robert, a senior who has had no heating or cooling in two years. He has a gas package unit on his home that has a burned-out compressor and is of an age that requires complete replacement. We can replace the unit for about \$3000. He has no other way to get cooling to his house this summer, besides the fans that he used last year. Fans don't really cool the air.</p> <p>☒ Enrique's water line has broken three times between his water meter in the alley and his home. The pipe is 67 year old steel and in CHRPA's matrix, it is a waste of time to repair it. The pipe requires replacement. The replacement requires trenching 35 feet through the yard, then 25 feet under his concrete patio. The actual plumbing is pretty simple once the trench is open.</p> <p>☒ Maria supports a household of two children and four grandchildren on her income of \$770 per month, working part time at a burrito company for \$10.70 per hour. She is trying to receive custody of the four grandchildren, but the home has no heating or cooling, and is thus unfit for the children, ages 9, 7, and 2 year old twins. They have survived the winter with warm clothing and two space heaters, but the summer is daunting. We would like to replace the</p> <p>defunct air conditioner / furnace on the home. This job</p>	
--	---	--

	<p>can be done for about \$3500.</p> <p>Richard had a fire in his carport, and in the process of putting out the fire, Tucson Fire opened the ceiling and roof in several locations, damaging some wiring. The power company turned off power and the home needs an electric service upgrade and some secondary wiring and fixture repairs before Richard can move back into his home. Richard is self-employed and has very low income. He would really, really like to move back home soon. He has stayed in shelters and with relatives since the fire in November.</p> <p>What these five cases have in common is:</p> <ol style="list-style-type: none"> 1. They are all City of Tucson residents. 2. They all have serious housing needs that they do not have the resources to address. 3. All of the jobs would cost less than \$5000 each. 4. The needed repairs would make a substantial and durable improvement in the lives of these Tucsonans and their families. 5. These households all meet CDBG eligibility requirements of home ownership, income, and being current on their property taxes. <p>It is unlikely that we will be able to address these situations because CDBG money is allocated for "Whole Home Rehab" instead of general rehab as is has been for the past three decades. "Whole Home Rehab" is, in my studied opinion, a travesty.</p> <p>We are in a frustrating position of knowing that the city has plenty of CDBG funds expressly for carrying out this type of work. The City's Annual Plan as well as the 5 Year Consolidated Plan both put appropriate emphasis and priority on affordable housing for owner-occupied homes. It is only because that money has capriciously been designated for "Whole Home Rehab" that resources are no longer available to resolve urgent needs.</p> <p>Our Acute Program, funded by City of Tucson general funds, is almost depleted, and wouldn't be able to address these situation anyways, because it has a \$1000</p>	
--	---	--

		<p>limit and is an admittedly small program to begin with. Jobs like these run us into that limit pretty quickly, and though we have leveraged the heck out of those funds all year, they are insufficient to get us through the end of the fiscal year.</p> <p>As we contemplate how to manage without our regular CDBG funds next year, we would like to once again challenge Mayor and Council to require HCD to engage with the agencies that are delivering service in the city's name, and provide oversight to the conversation. The non-profit agencies were not consulted about "Whole Home Rehab", and we warned against the idea when we did hear of it. There has never been an explanation or defense of the program that addressed the interests of the residents of Tucson.</p> <p>As always, we at Community Home Repair are willing to participate in any conversations regarding how best to use CDBG funds in the best interest of those among us who have the least resources and who are at the most risk of falling through the safety net of community resources. We see CDBG as one piece of a many-faceted system of community health and sustainability. It is in the interest of the community to see that resource used well.</p>	
--	--	---	--

Annual Action Plan May 30, 2018 Public Meeting Comments		
<p>Comment-Form Name: Anonymous</p>	<ul style="list-style-type: none"> • Bring support for transitional housing back. Rapid re-housing does not work for a lot of people who have been chronically homeless or those who lack experience being a renter. This costs landlords a lot of money and goodwill. • The City should demand that mental health providers who create affordable housing actually house homeless and mentally challenged households and provide quality services to them. The agencies are not working with the hardest to house of this population. • I am interested in the mobile home replacement program. 	<p>All comments were acknowledged and will be attached to the Annual Action Plan.</p>
<p>Comment-Form Name: Sarah Harris President of Feldman's Neighborhood Assn.</p>	<ul style="list-style-type: none"> • With the housing boom in student housing targeting high income students, is there a need for affordable student housing? This includes non- traditional/older students with families. Concern is that low income students are not served. • Our neighborhood is <10% owner-occupied. Concern is retaining owner occupants-rehab of existing homes and home purchase assistance will help. • We completed a sidewalk project to add missing sidewalks and replacing some. Also added ramps. This was done with grants from City and County. We could use another grant to finish what was started. • Affordable living for seniors with services comparable to the new expensive facilities that provide continuum of care. 	<p>All comments were acknowledged and will be attached to the Annual Action Plan.</p>
<p>Comment- Form Name: Terry Galligan Old Pueblo Community Services</p>	<ul style="list-style-type: none"> • There is a high demand for more low-demand (barrier) housing to help move people off the street into safe housing. • More street outreach services to the homeless is needed. • The community needs to invest in re-entry housing and services for people coming out of jail and prison. 	<p>All comments were acknowledged and will be attached to the Annual Action Plan.</p>

Comment Type-Form	Comments Received	Response
Comment-Form Name: Alison Hughes Catalina Vista Neighborhood	<ul style="list-style-type: none"> • Need more rental housing development in the larger empty acreage areas near bus stops in Tucson, rather than in tightly located housing neighborhoods. • Affordable senior living complexes. Independent, assisted housing are needed, especially in Southside and Westside. • Recommend more public facilities for homeless such as restrooms, etc. 	All comments were acknowledged and will be attached to the Annual Action Plan.
Comment –Form Name: George Kuck Flowing Wells Neighborhood	<ul style="list-style-type: none"> • Funding Assistance needed for low income owners of old single wide trailers to double wide. • How about funding purchase of land for low income trailer parks possibly for seniors only, that owns their own trailers. Example if this in Las Vegas. 	All comments were acknowledged and will be attached to the Annual Action Plan.
Comment Name: Mary Ann Beerling Compass Affordable Housing	<ul style="list-style-type: none"> • -Responding to Alison Hughes regarding affordable rental housing - Funding is from HUD. Cannot ask for more money. Funding can be leveraged with other sources of funding, public and private to create affordable housing. <p>-Continued-</p>	All comments were acknowledged and will be attached to the Annual Action Plan.

Comment Type-Meeting	Comments Received	Response
Comment Name: Alison Hughes	<ul style="list-style-type: none"> Concerns of "squatters" in empty homes. How can this funding help with this? Recommend an increase in homeless categories. Utilize open areas for high density homes. Student rentals-developers are buying up properties and turning them into mini dorms. Concern about zoning issues. In need of low income nursing facilities for elderly Are any of the funds available for healthcare needs? Rental housing issues-not enough available units. 	All comments were acknowledged and will be attached to the Annual Action Plan.
Comment Name: George Kuck	<ul style="list-style-type: none"> Does funding include owner occupied mobile homes? Can we (City) purchase land for low income mobile home parks? Can folks get upgrades (replacement) on mobile homes? 	All comments were acknowledged and will be attached to the Annual Action Plan.
Comment Name: Sarah Harris	<ul style="list-style-type: none"> Encourage older folks to stay in homes with funding. Availability of funds to help low income rent affordable housing. Build apartments for low income students 	All comments were acknowledged and will be attached to the Annual Action Plan.
Comment Name: Jeff Kalleng Our Savior's Lutheran Church	<ul style="list-style-type: none"> Needing more affordable housing Tax credit grants 	All comments were acknowledged and will be attached to the Annual Action Plan.

	Comment Type-Meeting	Comments Received	Response
	Comment Name: Sarah Launius Ward 3	<ul style="list-style-type: none"> • How can we utilize funds to target vacant structures? • City is applying for Choice Neighborhoods Grant. • Choice Neighborhoods funds-how will that be split up? 	All comments were acknowledged and will be attached to the Annual Action Plan.
	Comment Name: Zach Yarkow Menlo Park Neighborhood	<ul style="list-style-type: none"> • Gentrification issues in neighborhood-can funds be reallocated for low income down payment assistance? • Home purchase assistance is helping. • Is there a line item for economic development? 	All comments were acknowledged and will be attached to the Annual Action Plan.

Attachment 3b – City of Tucson – Pima County HOME Survey Results

City of Tucson – Pima County HOME Consortium/Downpayment Assistance Program Survey Results from participating Housing Counseling Agencies sent March 2, 2018. Survey closed March 28, 2018.

Results based on 11 responses out of 30 invitations.

-
- Responses to the question about amount of assistance (3.5% or \$3,700, whichever is less) as it pertains to the purchase of newly constructed homes or resales were evenly positive. To the contrary, those who say it's not beneficial for resales is the same as those who say it's not beneficial for the purchase of new construction. They covered the spectrum!
 - Most respondents (10) would be willing to stack the City/County DPA with other sources of DPA if compensated by each source.
 - To explore alternative strategies that will help agencies leverage the City/County HOME DPA program with other subsidies for first time homebuyers, most respondents (10) welcome the opportunity to join a roundtable discussion with local lenders, national banks, Fannie Mae, Freddie mac, the Federal Reserve Bank of San Francisco and others.
 - Facebook and the Annual City/County Homeownership Fair are among the most effective sources of referrals for housing counseling agencies. Others include events hosted by agencies, agency website postings and other community outreach events.
 - Most respondents (7) favor the FHA 203K mortgage product that includes funds for major home repair for the City/County DPA program to increase homeownership opportunities for low-income families.
 - To work around HUD income limits, price limits and other regulations, agencies offered the following suggestions to enhance the benefits of the City/County DPA Program:
 - Provide credit for major appliances and household furniture;
 - Increase the maximum allowable DPA (sometimes negotiations breakdown because Sellers refuse to pay for HQS repairs and Buyers should not be required to pay those costs until after they've purchased the homes);
 - Offer more classes to explain program criteria and processes for the use of DPA funds; and
 - Allow stacking
 - (One respondent said increase income limits, but that's controlled by HUD).
 - Half the respondents find extremely valuable both www.pimacountyhousingsearch.org and Mayor Rothschild's Initiatives (no one indicated either was of no value). Half find housing.az.gov very valuable. Of the three, only the state's website was found to be not valuable (by one).
 - Questions for the City and the County include the following:
 - Why isn't "Home Plus" available in Pima County ("It's excellent.")?
 - Why can't program income limits be increased?

Attachment 4 – Legal Ad Affidavit of Publishing for June 19, 2018, Mayor and Council public hearing

ARIZONA DAILY STAR

Tucson, Arizona

STATE OF ARIZONA
COUNTY OF PIMA

Debbie Freese, being first duly sworn deposes and says: that she is the Advertising Representative of **THE PARTNERS**, a General Partnership, organized and existing under the laws of the State of Arizona, and that it prints and publishes the Arizona Daily Star, a daily newspaper printed and published in the City of Tucson, Pima County, State of Arizona, and having a general circulation in said City, County, State and elsewhere, and that the attached ad was printed and

Legal Notice

published correctly in the entire issue of the said Arizona Daily Star on each of the following dates, to-wit:

JUNE 4, 2018

Debbie Freese

Subscribed and sworn to before me this 4th day of JUNE 2018

Notary Public

Debbie Freese

My commission expires

AD NO. 8796228



Attachment 5 – Summary of public comments received during the June 19, 2018 Mayor and Council public hearing, and Resolution No. 22887.

There were no speakers and no comments presented at the June 19, 2018 Mayor and Council public hearing.

ADOPTED BY THE
MAYOR AND COUNCIL

June 19, 2018

RESOLUTION NO. 22887

RELATING TO PUBLIC HOUSING; APPROVING THE PROPOSED CITY OF TUCSON (CITY) ANNUAL ACTION PLAN PROGRAM YEAR FOUR OF THE FIVE YEAR CONSOLIDATED PLAN FOR FISCAL YEAR 2019; AUTHORIZING AND DIRECTING SUBMITTAL OF THAT PLAN TO THE UNITED STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD); AND DECLARING AN EMERGENCY.

WHEREAS, the Department of Housing and Urban Development (HUD) requires the City of Tucson (City) to develop a five-year Consolidated Plan and update the Plan annually with a strategy for allocation and use of its federal funds; and

WHEREAS, the 2015-2020 Consolidated Plan was adopted by Mayor and Council in May of 2015; and

WHEREAS, the City, as a recipient of federal entitlement funds from HUD, is required to submit an Annual Action Plan specifying projects to be funded and implemented each fiscal year by HUD's programs; and

WHEREAS, these programs include the Community Development Block Grant (CDBG) program; the Home Investment Partnerships (HOME) program; Emergency Solutions Grant (ESG); and the Housing Opportunities for People with AIDS (HOPWA) program; and

(A0204196.DOC)

WHEREAS, in preparation for drafting the Proposed Annual Action Plan, citizen input was sought through public comment at two public meetings held on March 13, 2018, and May 11, 2018, with 30-day public comment periods from March 12, 2018 through May 11, 2018, and May 11, 2018 through June 10, 2018, and a draft of the Annual Action Plan made available to the public during that time; and public comment was invited at today's Mayor and Council Meeting; and

WHEREAS, Congress has not completed the appropriations process for the HUD FY 2019 budget, and in order not to delay the beginning of its 2018-19 program year any more than absolutely necessary, the City of Tucson developed its FY 2019 Annual Action Plan of proposed projects to be undertaken with entitlement funds based on last year's programs allocations, for submittal to HUD by June 30, 2018.

THEREFORE, BE IT RESOLVED BY THE MAYOR AND COUNCIL OF THE CITY OF TUCSON, ARIZONA, AS FOLLOWS:

SECTION 1. The Mayor and Council hereby approves the attached FY 2019 Annual Action Plan, attached hereto as Exhibit A, and by this reference fully incorporated herein.

SECTION 2. The Director of the City's Housing and Community Development Department or the Director's designee is hereby authorized and directed to execute as many counterparts of Exhibit A and such other related documents as may prove necessary or appropriate to achieve the ends of this Resolution and to submit the same to HUD.

{A0204196.DOC}

SECTION 3. The various City officers and employees are authorized and directed to perform all acts necessary or desirable to give effect to this Resolution.

SECTION 4. WHEREAS, it is necessary for the preservation of the peace, health and safety of the City that this Resolution become immediately effective, an emergency is hereby declared to exist and this Resolution shall be effective immediately upon its passage and adoption.

PASSED, ADOPTED AND APPROVED BY THE MAYOR AND COUNCIL
OF THE CITY OF TUCSON, ARIZONA, June 19, 2018.

MAYOR

ATTEST:

CITY CLERK

APPROVED AS TO FORM

REVIEWED BY:



CITY ATTORNEY

CITY MANAGER

DD/SS/tl
6/5/18

{A0204196.DOC}

Grantee Unique Appendices

City of Tucson FY 2019 (PY2018) Annual Action Plan

Grantee Unique Attachments and Appendices

Attachment 6

AP-50 Additional Information for Rationale for the priorities for allocating investments geographically

Attachment 7

AP-65 Additional Information for Introduction Section regarding 51 Homes and 25 Cities

Attachment 8

AP-90 City of Tucson and Pima County HOME Resale and Recapture Provisions

Attachment 9

Citizen Participation Plan

Attachment 10

City of Tucson June 2018 Entitlement Action Plan Checklist

Appendix A

FY 2019 Human Services Program Funding

Appendix B

2015-2019 City of Tucson Five-year Consolidated Plan (link only)

https://www.tucsonaz.gov/files/hcd/Amended_Five_Year_Consolidated_Plan_2015_2019.pdf

Appendix C

City of Tucson Human Services Plan

Appendix D

Policy Manual for Emergency Solutions Grant (ESG) Program

Appendix E

Continuum of Care (COC) Program Written Standards

Attachment 6 – AP-50 Additional Information, rationale for allocating investments geographically

Lead Based Paint Hazard Control (LBPHC) + Healthy Homes: The City of Tucson has the 5th highest poverty rate in the United States. Poverty is a major risk factor in lead poisoning; therefore lead poisoning is a significant health threat in Tucson. The Arizona Department of Health Services (AHS) has identified 21 zip codes in the Tucson area where children are at high risk of lead poisoning. Approximately 70 percent of Tucson lies within a high risk zip code. There are, 40,668 children under the age of six in the City of Tucson, 13,768 of who live in low- to moderate-income areas in homes constructed prior to 1978. Prevention, control, abatement and remediation of lead based paint hazards in areas of high risk such as Tucson is essential to reducing the occurrence of childhood lead poisoning. The City will apply \$2.9 million in grant funds from the HUD-funded LBPHC+Healthy Homes program to control lead hazards in this area.

Analysis of PHA portfolio and options: The City of Tucson is in the process of completing an analysis of the Public Housing portfolio to identify strategies for long-term viability. Issues under evaluation include: 1) funding sources; 2) financing mechanisms; 3) rent structures; 4) capital and structural improvements; 5) property mix and locations; 6) operations costs, energy costs and management efficiencies; 7) neighborhood context and revitalization initiatives; 8) coordination of City services for low-income residents; and 9) maintaining the one-for-one replacement of any units that are removed from the public housing portfolio.

Oracle Choice Neighborhoods and Related Initiatives: In 2016 and 2017 the City of Tucson applied for Choice Neighborhoods Planning and Action Grants from the U.S. Department of Housing and Urban Development (HUD). The Choice Neighborhoods application, known as the Oracle Choice Neighborhoods Initiative (OCNI) encompasses 2.6 square miles and includes Tucson House, a 408 unit, seventeen-story public housing facility serving elderly and disabled persons that represents 27% of the local PHA public housing portfolio. A physical needs assessment for Tucson House prepared in support of the OCNI resulted in a “severely distressed” designation, due to the antiquated physical systems in the building. Tucson House is located in a high-stress neighborhood with an adopted revitalization area plan, the Oracle Area Revitalization Project (OARP).

The applications were not selected for funding. The City will evaluate future Choice Neighborhood grants if they become available and will continue to pursue other avenues to address the needs identified in the Choice Neighborhoods application to transform and revitalize Tucson House and the surrounding neighborhood.

In October 2017, the Arizona State University School of Social Work was awarded funding for a Community Based Crime Reduction initiative for the Oracle Area. This initiative will support research, planning, and implementation activities to address social drivers of crime within an area that is largely coincident with the OARP and OCNI area. The Rose Center for Public Leadership in Land Use, a program of the National League of Cities (NLC) in partnership with the Urban Land Institute (ULI) chose this same area for its 2018 Fellowship Program. The Fellowship Program provided recommendations to improve community engagement, corridor identity, and pedestrian safety (approximately 2/3 of renters in the area do not have access to a car). The City of Tucson will allocate \$250,000 of CDBG funding for facilities

and infrastructure projects to further implementation of recommendations from both the Community Based Crime Reduction Initiative and the Rose Center Fellowship.

Rental Assistance Demonstration (RAD): The PHA is continuing to investigate additional options for making the needed improvements to Tucson House, including evaluating the possibility of a Rental Assistance Demonstration (RAD) conversion.

Energy Performance Contract: The PHA has done some preliminary evaluations and is considering an energy performance contract for the entire portfolio of public housing.

South 12th Avenue Corridor: In FY 2017 HUD funded a technical assistance team to help the City of Tucson evaluate revitalization and growth opportunities in the South 12th Avenue Corridor that is located in the CDBG target area. This technical assistance contract with the National Association for Latino Community Asset Builders (NALCAB) is underway and will result in a set of recommendations and a "toolkit" for the phased implementation of projects on various scales. The City will use \$50,000 in FY 2018 CDBG funds to conduct an infrastructure study in this area.

Attachment 7 – AP-65 Additional Information for Introduction Section regarding 51 Homes and 25 Cities

The City also participated in the following efforts using these as a foundation for addressing the most serious issues associated with chronic homelessness.

51 Homes In 2011, TPCB and the Continuum joined the National 100,000 Homes Campaign and pledged to provide 51 homes for the most vulnerable chronically homeless veterans in the Tucson Community. The City of Tucson, the Veterans Administration, CODAC Behavioral Health, local non-profit service providers, as well as local landlords came together to provide permanent housing for homeless veterans. With grants from the Veterans Service Foundation, the Pima County Sheriff's Department, Democratic Club of the Santa Rita Area, Desert Hills Lutheran Church and major donations of furniture and supplies from Davis-Monthan Air Force Base, veterans that were housed received new beds, furniture, kitchen and bathroom items, linens, personal care items, and cleaning supplies. It is anticipated 50 veterans will be assisted in 2018.

25 Cities In March 2014 the U.S. Department of Veterans Affairs launched the *25 Cities Initiative* to assist communities with high concentrations of homeless Veterans in intensifying and integrating their local efforts to end Veteran homelessness. Tucson was selected to be one of the 25 cities to end both veteran and chronic homelessness. We worked with the Continuum to create a coordinated entry system utilizing the VI SPDAT to match homeless persons with housing. Combined with our efforts of 51 Homes, we are looking to significantly reduce homelessness every year.

Attachment 8 – AP-90 City of Tucson and Pima County HOME Resale and Recapture Provisions

AP-90 Program Specific Requirements - 91.420, 91.220(l)(1,2,4)

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.420, 91.220(2)

Question 3 - a description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

City of Tucson HOME Resale/Recapture Provisions:

Homeownership - Recapture

Homeownership development and down-payment assistance activities funded with City HOME funds will utilize Recapture Provisions, which meet or exceed HOME Program Affordability requirements. For FY 17-18, the HOME funds allocated to homeownership activities are assigned to our jointly funded City-County Down Payment Assistance Program that will provide direct assistance of 3.5% of purchase price (maximum \$3700) which will carry zero interest with a 5 year affordability requirement. If the property is sold or ceased to be primary residence during the affordability period then the HOME funds will be recaptured. In the event of a sale, HOME funds are recaptured from the available net sales proceeds, which are defined as the sales price, less first mortgage pay-off, less homeowner's equity & less closing costs. If HOME funds are used to fund down payment assistance on other development projects or CHDO projects, the City will follow the same recapture provisions described above – except that the amount of direct assistance may vary based on homebuyer underwriting and may exceed the 3.5% utilized for the City-County DPA program. Affordability period will vary from 5 to 15 years based on the amount of direct assistance provided to the homebuyer – following HOME Regulations at 92.254

Homeownership - Resale

The City will utilize Resale provision in the event a non-profit or profit organization and developer contract with the City for homeowner development for first-time home buyers. The City's Resale restriction will require that if the home is sold during the affordability period, it must be sold to another low-income household. The Affordability period will vary from 5 to 15 years based on the amount of the HOME funds invested the housing as per the HOME regulations at 92.254. The resale requirement will ensure that the price at resale provides the original HOME-assisted owner a fair return on investment (including the homeowner's investment and any capital improvement) and ensure that the housing will remain affordable to a reasonable range of low- income homebuyers. "Fair return on investment" means that the original homeowner shall be permitted to recuperate the amount they invested for down payment, principal paid on mortgage as well as value of any property improvement paid for by the assisted owner. "Affordability" to a reasonable range of low-income homebuyers," means that the mortgage payment including principal, interest, taxes and insurance –will not exceed 30% of the low-income buyer's income; and low-income buyers are defined as households earning at or below 80% of AMI. Additional HOME funds may be used to provide direct down

payment assistance for a subsequent buyer in order to provide for the required level of Affordability; and if so the Affordability period will be based on the new assistance provided.

Rental

Rental Development projects funded with City HOME funds will utilize HOME Recapture provisions which meet the HOME Program Affordability Requirements. City staff with contracted consultant will complete required project underwriting to determine a reasonable interest rate and terms that are supported by the underwriting. In most case the funds invested will be at level that will require a minimum 20 year affordability period that will be secured the recorded Covenants Conditions and Restrictions (CCR's).

Pima County HOME Resale/Recapture Provisions:

Homeownership - Recapture

Homeownership preservation, development and down - payment assistance activities funded with County HOME funds will utilize Recapture Provisions which meet or exceed HOME Program Affordability requirements. For FY 17-18, a majority of County's HOME funds allocated to homeownership activities are assigned to our jointly funded City-County Down Payment Assistance Program that will provide direct assistance of 3.5% of purchase price (maximum \$3700) which will carry zero interest with a 5 year affordability requirement. If the property is sold or ceased to be primary residence during the affordability period then the HOME funds will be recaptured. In the event of a sale, HOME funds are recaptured from the available net sales proceeds which are defined as the sales price, less first mortgage pay-off, less homeowner's equity & less closing costs.

If HOME funds are used to fund down payment assistance on other development projects or CHDO projects, County will follow the same recapture provisions described above – except that the amount of direct assistance may vary based on homebuyer underwriting and may exceed the 3.5% utilized for the City-County DPA program. Affordability period will vary from 5 to 15 years based on the amount of direct assistance provided to the homebuyer – following HOME Regulations at 92.254.

Homeownership - Resale

In the event HOME funds are combined with General Obligation Affordable Housing Bond Funds or with homes purchased through the Pima County Community Land Trust, the HOME funds may be provided utilizing Resale provisions in compliance with HOME Program regulations. The County's Resale restriction will require that if the home is sold during the affordability period, it must be sold to another low-income household. The Affordability period will vary from 5 to 15 years based on the amount of the HOME funds invested the housing as per the HOME regulations at 92.254. The resale requirement will ensure that the price at resale provides the original HOME-assisted owner a fair return on investment (including the homeowner's investment and any capital improvement) and ensure that the housing will remain affordable to a reasonable range of low- income homebuyers. "Fair return on investment" means that the original homeowner shall be permitted to recuperate the amount they invested for down payment, principal paid on mortgage as well as value of any property

improvement paid for by the assisted owner. "Affordability" to a reasonable range of low-income homebuyers," means that the mortgage payment including principal, interest, taxes and insurance –will not exceed 30% of the low-income buyer's income; and low-income buyers are defined as households earning at or below 80% of AMI. Additional HOME funds may be used to provide direct down payment assistance for a subsequent buyer in order to provide for the required level of Affordability; and if so the Affordability period will be based on the new assistance provided.

Rental

Rental Preservation and Development projects funded with County HOME funds will utilize HOME Recapture provisions, which meet the HOME Program Affordability Requirements. County staff will complete required project underwriting to determine a reasonable interest rate and terms that are supported by the underwriting. In most case, the funds invested will be at level that will require a minimum 20 years affordability period that will be secured the recorded Covenants Conditions and Restrictions (CCR's). Recaptured Funds will be used to fund other HOME eligible homeownership assistance, rental development or TBRA activities.

Attachment 9
Citizen Participation Plan

CITY OF TUCSON

Housing and
Community
Development Dept.

2017 Citizen Participation Plan

This plan outlines how citizens can participate in an advisory role in the planning, implementation, and assessment of the City of Tucson - Pima County 5-Year Consolidated Plan, Annual Action Plan, and Consolidated Annual Performance and Evaluation Report (CAPER)

**2017 CITY OF TUCSON
HOUSING AND COMMUNITY DEVELOPMENT DEPARTMENT
CITIZEN PARTICIPATION PLAN/ANTI-DISPLACEMENT PLAN**

CITIZEN PARTICIPATION PLAN

Purpose and Applicability

This Citizen Participation Plan has been prepared to provide Tucsonans, especially low and moderate income Tucsonans, an opportunity to participate in an advisory role in the planning, implementation, and assessment of the City of Tucson/Pima County 5-Year Consolidated Plan, Annual Plans, and Consolidated Annual Performance and Evaluation Report (CAPER), and complies with Federal citizen participation regulations applicable under 24 CFR (Code of Federal Regulations) 91.105. It is also intended to comply with Plan Tucson policies to collaborate with nongovernmental organizations to increase public participation, provide the public with regular communication and sufficient information regarding policy, program, and project planning, and increase participation by traditionally underrepresented populations. It applies to and specifies the policies and procedures for public participation for the City of Tucson/Pima County 5-Year Consolidated Plan, Annual Plans, and Consolidated Annual Performance and Evaluation Report.

5-Year Consolidated Plan Summary

U.S. Department of Housing and Urban Development (HUD) regulations require the preparation of a 5-Year Consolidated Plan for the City of Tucson and Pima County HOME Consortium, hereinafter referred to as the Consortium. The 5-Year Consolidated Plan provides a framework for identifying affordable housing, homeless/special needs, and community development priorities, and guidance for how grants provided by HUD will be spent in Tucson and Pima County, including federal Community Development Block Grants (CDBG), Emergency Solutions Grants (ESG), HOME Investment Partnerships Program grants (HOME), and Housing Opportunities for Persons with AIDS grants (HOPWA). The draft 5-Year Consolidated Plan is prepared in May of a given year and shall include citizen participation.

Provisions of the Citizen Participation Plan

1. Consultation. The Consortium shall consult with current City of Tucson Housing and Community Development Human Services Applicant Agencies, the Housing Rehabilitation Collaborative, the Metropolitan Housing Commission, and the Tucson-Pima County Collaborative to End Homelessness, for input on the 5-Year Consolidated Plan and Annual Plans. Requests for input shall be solicited through online surveys publicized on the HCD website and social media, and supplemented by mass emails to HCD stakeholders and Neighborhood Associations registered with the City of Tucson. As needed and applicable, the Consortium will also consult with public housing residents, low-income residents of targeted revitalization areas in which federal projects are anticipated. These Plans will be made available to local housing authorities on a continuing basis and for public meetings/hearings to be held under HUD Capital Grant Program or Public Housing Agency Plan established pursuant to 24 CFR Part 903. A limited number of free printed copies will be made available for those who request it.

**2017 CITY OF TUCSON
HOUSING AND COMMUNITY DEVELOPMENT DEPARTMENT
CITIZEN PARTICIPATION PLAN/ANTI-DISPLACEMENT PLAN**

2. **Public Comment Periods.** On or before April 1 of any given year, the Consortium will make available the draft 5-Year Consolidated Plan or draft Annual Plan on the City and County websites for a 30 day public comment period.

On or around September 1 of any given year, the Consortium will make available the draft Comprehensive Annual Performance Evaluation Report (CAPER) on the City and County websites for a 15 day public comment period.

Public notice shall be provided for each public comment period prior to the first day of the public comment period and may be combined with public notice for a public meeting/hearing where applicable. Public notice shall be published in a local newspaper of general circulation, posted on the City of Tucson website, and provided to the current City of Tucson Housing and Community Development Human Services Applicant Agencies, the Housing Rehabilitation Collaborative, the Metropolitan Housing Commission, and the Tucson-Pima County Collaborative to End Homelessness. The public notice shall include a summary of the draft 5-Year Consolidated Plan or draft Annual Plan, the physical location and website where citizens may review copies of draft plans, and a mailing address, email address, and fax number for submittal of comments. The Consortium will provide citizens, public agencies and other interested parties with reasonable and timely access to public records relating to their past use of HUD funds and related assistance for the previous five years.

Any citizen, organization, or group desiring to make a comment regarding the 5-Year Consolidated Plan, the Annual Plan, or the Comprehensive Annual Performance Evaluation Report (CAPER) may do so in writing, or by email to the Consortium during the public comment period, or in writing or verbally during the public meetings/hearings. The Consortium shall respond to written and email comments within 15 working days of receiving the comment where practicable. Responses will be provided in the same manner in which they were submitted. All Consortium responses will be posted to the City and County websites. The response will include a description of any action that will be taken as a result of citizen comments. Comments received during the public comment period will be made a part of the public record and provided to Mayor and Council. A summary of the comments and responses shall be attached to the final 5-Year Consolidated Plan, Annual Plan, and the Comprehensive Annual Performance Evaluation Report (CAPER) submitted to HUD. Citizens may also submit comments directly to HUD, though these comments, unless also submitted to the Consortium, cannot be made a part of the public record.

3. **Public Meetings/Hearings.** The Consortium shall hold at least one public meeting and one public hearing for input on the 5-Year Consolidated Plan, or the Annual Plan. The public meeting shall be held during Plan formulation and preparation. A Mayor and Council public hearing shall be held once the draft Plan has been completed. The public meetings/hearings will address:

**2017 CITY OF TUCSON
HOUSING AND COMMUNITY DEVELOPMENT DEPARTMENT
CITIZEN PARTICIPATION PLAN/ANTI-DISPLACEMENT PLAN**

- The amount of HUD funds (CDBG, ESG, HOME, and HOPWA) anticipated to be made available on a fiscal year basis, and the eligible range of activities that may be undertaken concerning such federal programs.
- The amount of HUD funds (CDBG, ESG, HOME, and HOPWA) that will be directed to very low- and low-income persons on a fiscal year basis.
- The range of HUD activities that may be undertaken with the funding being discussed.
- Priorities for affordable housing, homeless and special needs populations, and community development in Tucson and Pima County.
- Plans to minimize the displacement of persons assisted through the use of HUD funds (CDBG, ESG, HOME, and HOPWA)
- Other aspects of the 5-Year Consolidated Plan and Annual Plans as applicable.

Public meetings/hearings to be conducted by the Consortium shall be held at times determined by the Consortium with consideration made for public convenience and accessibility.

Public notice shall be provided for each public meeting/hearing a minimum of 15 days prior to the public meeting/hearing. Public notice shall be published in a local newspaper of general circulation, posted on the City of Tucson website, and provided to the current City of Tucson Housing and Community Development Human Services Applicant Agencies, the Housing Rehabilitation Collaborative, the Metropolitan Housing Commission, and the Tucson-Pima County Collaborative to End Homelessness. The public notice shall include a summary of the draft 5-Year Consolidated Plan or draft Annual Plan, the physical location and website where citizens may review copies of draft plans, and a mailing address, email address, and fax number for submittal of comments. The Consortium will provide citizens, public agencies and other interested parties with reasonable and timely access to public records relating to their past use of HUD funds and related assistance for the previous five years.

4. Accommodations for non-English speaking persons and/or persons with disabilities. To encourage participation by non-English speaking persons, where applicable, a bilingual Spanish/English staff person shall be present at public meetings/hearings to meet the needs of Spanish speaking persons. For complete information, please refer to the Housing and Community Development Limited English Proficiency Language Assistance Plan (<https://www.tucsonaz.gov/files/hcd/LEP2015.pdf>). Specific determinations on accommodations to encourage participation by persons with disabilities will be made by Consortium staff on a case by case basis.
5. Complaints. Throughout the year, the Consortium shall provide a substantive response to every written citizen complaint related to the 5-Year Consolidated Plan, amendments, Annual Plan, and Consolidated Annual Performance Report (CAPER) within 15 working days of receiving the complaint where practicable.

**2017 CITY OF TUCSON
HOUSING AND COMMUNITY DEVELOPMENT DEPARTMENT
CITIZEN PARTICIPATION PLAN/ANTI-DISPLACEMENT PLAN**

Adoption of the Citizen Participation Plan

Prior to adoption of the Citizen Participation Plan, the Consortium will provide notice that the draft Citizen Participation Plan is available for review and comment. This notice will be published in a local newspaper of general circulation, posted on the City of Tucson website, and provided to the current City of Tucson Housing and Community Development Human Services Applicant Agencies, the Housing Rehabilitation Collaborative, the Metropolitan Housing Commission, and the Tucson-Pima County Collaborative to End Homelessness Metropolitan Housing Commission, the Housing Rehabilitation Collaborative, and the Tucson Planning Council for the Homeless.

Criteria and Process for Amendments

The following are considered substantial changes to 5-Year Consolidated Plan and/or Annual Plan:

1. Changes in any method of distribution for HUD funds (CDBG, ESG, HOME, and HOPWA) that will alter the manner in which funds are allocated to individual projects or entities identified in the Plan by at least 20% of any annual allocation, subject to other program requirements in the CFR as applicable.
2. Changes that are made to funding priorities in the 5-Year Consolidated Plan (including prospective changes to McKinney-Vento Act programs and distribution methods) over time when not undertaken through annual submission requirements stipulated by HUD.
3. Project deletions or changes made in allocation priorities or methods of distribution that have the effect of changing the funding level of individual CDBG projects identified in the Annual Plan by more than 10% of the annual funding level, subject to other program requirements in CFR as applicable. Any new project funded with CDBG resources must be noticed to the public prior to funding.
4. To carry out an activity, using funds from any program covered by the 5-Year Consolidated Plan (including program income), not previously described in the current Annual plan.
5. To substantially change the purpose, scope, location, or beneficiaries of an activity. This refers to changes that are made to projects to be funded in the 5-Year Consolidated Plan when not undertaken through annual submission requirements stipulated by HUD.
6. Significant changes in the use of CDBG funds from one eligible activity to another.

Substantial changes shall require an amendment to the 5-Year Consolidated Plan and Annual Plans will be subject to the following:

1. Public notice of the proposed amendment shall be published in a local newspaper of general circulation, posted on the City of Tucson website, and provided to the current City of Tucson Housing and Community Development Human Services Applicant Agencies, the Housing Rehabilitation Collaborative, the Metropolitan Housing Commission, and the Tucson-Pima County Collaborative to End Homelessness. The notice shall include a summary of the proposed amendment, a request for public comments, the start and end dates of a 30 day public comment

**2017 CITY OF TUCSON
HOUSING AND COMMUNITY DEVELOPMENT DEPARTMENT
CITIZEN PARTICIPATION PLAN/ANTI-DISPLACEMENT PLAN**

period, the physical location and website where citizens may review copies of draft plans, and a mailing address and email address to submit comments.

2. The amendment(s), public comments received, and the response(s) of the Consortium shall be provided to the Mayor and City Council for review and approval at a public hearing following the 30 day public comment period.
3. The Consortium will notify HUD of any amendments executed, public comments received, and the response(s) of the Consortium.

ANTI-DISPLACEMENT PLAN

The Consortium shall take all reasonable steps to minimize the displacement of persons assisted through the use of HUD funds (CDBG, ESG, HOME, and HOPWA). Persons temporarily displaced through the use of HUD funds (CDBG, ESG, HOME, and HOPWA) may receive optional relocation assistance. Optional relocation assistance may be provided when conditions in a structure pose an immediate hazard to the health and/or welfare of the occupant(s) of a structure or adjoining structure. Optional relocation assistance may be provided to displaced persons when completion of the work associated with the temporary displacement will require more than one day, not exceed 16 days. The Consortium shall secure decent, safe, and sanitary temporary housing, using CDBG funds, in motel rooms or rental properties. Relocation assistance, including room, meals, and transportation, to be paid by the Consortium, are estimated to range from \$100 to \$125 per day. Costs recovered by insurance or court order will be treated as program income. Implementation of optional relocation assistance will be a matter of last resort when all other available resources in the community have been exhausted.

CONTACT INFORMATION

Comments may be made or information and materials may be received by contacting the City of Tucson at:

Physical Address:

Housing and Community Development Department
Planning and Community Development Division
310 N. Commerce Park Loop, Tucson, AZ 85745

Mailing Address: P.O. Box 27210, Tucson, AZ 85726-7210

Email Address: HCDAdmin@tucsonaz.gov

Phone Number: 520-791-4171

Fax Number: 520-791-5407

Website: <https://www.tucsonaz.gov/hcd>

Attachment 10 – ENTITLEMENT ACTION PLAN CHECKLIST

Grantee: <u>City of Tucson</u>		Period Covered by Consolidated Plan: <input type="checkbox"/> 3 <input checked="" type="checkbox"/> 4 <input type="checkbox"/> 5 years	
Start year: <u>2016</u>		End Year: <u>2020</u>	
Reviewed by: _____		Date: _____	
Programs covered by plan: <input checked="" type="checkbox"/> CDBG <input checked="" type="checkbox"/> HOME <input checked="" type="checkbox"/> ESG <input checked="" type="checkbox"/> HOPWA <input type="checkbox"/> HTF			
Date plan received in IDIS: _____			
<input type="checkbox"/> Original, signed SF 424s received	Date Received: _____		
<input type="checkbox"/> Original, signed Certifications received	Date Received: _____		
Automatic approval date: _____			
Note: The 45-day review period begins when the Field Office receives the signed, hard copies of the SF-424 and certifications or email notification that the Con Plan has been submitted in IDIS, whichever is later.			

New Checklist Review Items:

The following information has been incorporated into this version of the checklist.

- **AFFH specific requirements** – Only required for grantees that have an AFH to HUD. To complete a review of AFFH requirements, CPD representatives will need access to the AFH Tool. See your System Administrator to obtain access.
- **HTF specific requirements** – Only applies to plans submitted on or after January 1, 2018. HUD has released new HTF screen enhancements in the Fall of 2017. The screen enhancements have been built into this checklist.
- **Project set-up** - Clarification on how projects should be set-up in the e-Con Planning Suite to eliminate duplicated in IDIS and the CAPER report.

How to handle submissions when allocations have not been announced:

Field offices and grantees are advised to follow the latest CPD Notice, Guidance on Submitting Consolidated Plans and Annual Action Plans, on when plans should be submitted when allocations have not been announced.

The Notice is available at: <https://portal.hud.gov/hudportal/documents/huddoc?id=16-18cpdn.pdf>.

The 45-day review period:

The 45-day review period begins when the Field Office receives either the signed hard copies of the SF-424 and certifications **or** when they receive the email notification that the Con Plan and/or Annual Action Plan have been submitted in IDIS, whichever occurs later.

Plan approval, congressional release, and the grant agreement process:

Field Offices are reminded plans should not be approved in the system until notified by the Office of Field Management. It is important plans are not approved (changed to Review Completed status in IDIS) in advance of a congressional release. For questions on this process, contact the Office of Field Management.

No additional paper plan submissions (draft or final) should be required by the field office:

All Consolidated Plans must be submitted in the e-Con Planning Suite template. CPD Notice12-09 describes requirement at: <http://portal.hud.gov/huddoc/12-09cpdn.pdf>

- **ONLY** original, signed copies of the SF-424, assurances, and certifications must still be submitted in paper by the grantee
- Do not require a grantee to send in a paper version of a con plan or annual action plan, draft or official.
- Field Offices may review draft versions of the plan in the system when the grantee sets the plan in "Open-In Progress/FO Review" status on the AD-25 screen.

SF-424 Form:

This is a standard form required for use as a cover sheet for submission of pre-applications and applications and related information under discretionary programs.

Grantees should submit one SF-424 Form for each grant program.

Only original documents with "wet" signatures will be accepted. The most up to date version of the SF-424 Form may be found at www.grants.gov.

- Select Forms:



- Select SF-424 Family. The third item in the list is a fillable form. Complete and execute the form with an original signature. Mail executed forms to HUD prior to plan submission deadline. Electronic signatures will not be accepted by HUD. Copies of the executed document will not be accepted by HUD.



- Select the Assurances appropriate for each CPD program:

How to tell if the lead set-up the consortia plan correctly:

IDIS automatically creates a separate template for each entitlement consortium member when the Lead Entity template is created. To see these templates:

1. Click "Search" from the Con Plan submenu on the left.
2. A separate template is listed for the Lead Entity and each entitlement consortium member. Note: They all have the same titles.

Results Page 1 of 2

Consort Name	State	Year	Version	Title	Status	Action
BATTLE CREEK	MI	2015	Version 1.1	City of Battle Creek Consolidated Plan 2015-2019	Review Completed	View
BAY CITY	MI	2015	1	City of Bay 2015-2019 Consolidated Plan	Review Completed	View
CLIFTON TOWNSHIP (MACOMB COUNTY)	MI	2014	1	Macomb HOME Consortium	Review Completed	View
DETROIT	MI	2015	1	2015-2019 Consolidated Plan Strategy	Review Completed	View
DETROIT	MI	2015	2	2015-2019 ConPlan Amendment	Reviewed and Forwarding for Modifications	View
GENESEE COUNTY	MI	2015	Draft 1	Genesee County, Michigan Five Year Consolidated Plan for 2015 - 2020	Review Completed	View
HOLLAND	MI	2015	1	City of Holland Five Year Community Development Plan	Review Completed	View
JACKSON	MI	2015	5-year	5-year ConPlan	Review Completed	View
KALAMAZOO	MI	2014	01	City of Kalamazoo Consolidated Plan	Review Completed	View
MACOMB COUNTY	MI	2014	1	Macomb HOME Consortium	Review Completed	View

Results Page 2 of 2

Consort Name	State	Year	Version	Title	Status	Action
PROUDMAN	MI	2015	2015	Five Year Plan	Review Completed	View
HOLLAND	MI	2015	1	City of Holland 2015-2020	Review Completed	View
PORT HURON	MI	2015	1	City of Port Huron Consolidated Plan 2015-2019	Review Completed	View
ROSELLE	MI	2014	1	Macomb HOME Consortium	Review Completed	View
SAGINAW	MI	2016	Draft 1/2/16	Saginaw Consolidated Plan	Submitted for Review	View
ST. CLAIR SHORES	MI	2015	1	2015-2020 Consolidated Plan	Review Completed	View
STERLING HEIGHTS	MI	2014	1	Macomb HOME Consortium	Review Completed	View
WASHTENAW COUNTY	MI	2015	1	Washtenaw County 2015-2020 Consolidated Plan	Review Completed	View
WESTLAND	MI	2016	Original	Westland, MI Consolidated Plan 2016-2020	Submitted for Review	View

A second check is to look at the Lead Entity's AD-25 screen, to make sure all participating members were selected.

Entitlement Action Plan Checklist

January 2018

AD-26: Consortium Specific: \$91.400

Name	FIRM/STATE	HOME	CDBG	ESG
PIMA COUNTY GOVERNMENT	PIMA COUNTY, AZ	10-100-0001	10-100-0001	10-100-0001
ARIZONA	ARIZONA, AZ	10-100-0001	10-100-0001	10-100-0001
PIMA COUNTY GOVERNMENT	PIMA COUNTY, AZ	10-100-0001	10-100-0001	10-100-0001

AD-26: Consortium Specific: \$91.400

If a Consortia, list participating communities & note status	Lead	HOME funds only	CDBG Entitlement	ESG Entitlement
Pima County Government		HOME		

Yes ☒ No ☐ Did the lead select Consortia and the plan type and enter all participating communities and their status correctly?

Yes ☒ No ☐ Did each of the CDBG and ESG entitlement communities complete an attached participating consortium plan?

If any of the entitlement participating members are missing or an entitlement participating member has completed a standalone plan, immediately send this submission back to the jurisdiction for correction.

For additional information on how consortia plans should be set up in the system, consult the e-Con Planning Suite Desk Guide at <https://www.hudexchange.info/resource/2641/econ-planning-suite-desk-guide-idis-conplan-action-plan-caper-per/>. Incorrectly set-up plans cannot be approved until set-up correctly.

Comments/Verification: _____

AD-26: Administration §91.220(a)

Yes ☒ **No** ☐ Does each original Standard 424 Form contain the correct ((DUNS) Number in block 8(c)) with the applicable programs, the correct dollar allocations, and signed by the appropriate official been received by the field office?

Note: States can upload a scanned copy in the AD-25 screen, but they are still required to submit one original signed copy of each document to HUD.

Yes ☒ **No** ☐ Did the grantee enter HUD's program year and not its local program year.

Comments/Verification: _____

AP-05: Executive Summary §91.200(c), §91.220(b)

Yes ☒ **No** ☐ Does the plan contain a concise executive summary that includes:

_____ Objectives and outcomes?

_____ An evaluation of past performance?

_____ A summary of the citizen participation process and public comments?

_____ A description of efforts made to broaden public participation in the development of the plan?

Comments/Verification: _____

PR-05: Lead and Responsible Agencies §91.200(b)

Yes ☒ **No** ☐ Is there a description of the lead agency or entity responsible for overseeing the development of the Consolidated Plan? See also AP-10 and AP-12.

Comments/Verification: _____

AP-10: Consultation/Coordination §91.100, §91.200(b), §91.215(l)

AFH Specific: Once a local jurisdiction has submitted an AFH it must comply with additional consultation requirements as described in the regulation. These requirements are noted on this checklist under "AFH specific".

Yes ☒ **No** ☐ Does the plan provide a concise summary of the grantee's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health, and service agencies (91.215(l))?

Yes ☒ **No** ☐ Does the plan provide a concise summary of the grantee's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health, and service agencies (91.215(l))?

Yes ☒ **No** ☐ Does the plan describe coordination with continuums of care and efforts to address the needs of homeless persons (particularly homeless individuals and families, families with children, veterans and unaccompanied youth) and persons at risk of homelessness?

Entitlement Action Plan Checklist

January 2018

Yes ☒ **No** ☐ ESG Specific: If a jurisdiction receives an ESG grant, does its plan describe the grantee's consultation with continuums of care to determine how to allocate ESG funds, develop performance standards and evaluate outcomes of projects and activities assisted with ESG funds and develop funding policies and procedures for the operation and administration of HMIS?

Yes ☒ **No** ☐ Does the plan describe coordination with the following entities in preparing the jurisdiction's homeless strategy and resources available to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and unaccompanied youth) and persons at risk of homelessness?

- ☐ Housing Services and Assisted Housing
- ☐ Health Services
- ☐ Social and fair housing services, including those focusing on services to children, elderly person, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons.
- ☐ Continuum(s) of Care that serve the jurisdiction's geographic area
- ☐ Public and private agencies that address housing, health, social service, victim services, employment, or education needs of:
 - low-income individuals and families,
 - homeless individuals and families, including veterans, youth and persons with special needs
- ☐ Publicly funded institutions and systems of care that may discharge persons into homelessness, such as:
 - health-care facilities
 - mental health facilities
 - foster care and other youth facilities
- ☐ Corrections programs and institutions
- ☐ Business and Civic Leaders

Yes ☒ **No** ☐ Does the plan describe consultation with the following entities in preparing the portion of the jurisdiction's plan concerning lead-based paint hazards: State and local health and child welfare agencies, including health department data on the addresses of housing units in which children have been identified as lead-poisoned?

Yes ☒ **No** ☐ Adjacent units of general local government and regional government agencies, particularly agencies with metropolitan-wide planning and transportation responsibilities that go beyond a single jurisdiction.

Yes ☒ **No** ☐ Persons, especially low income persons, living in areas designated by the local jurisdiction as a revitalization area, areas designated by either a local jurisdiction or as a slum and blighted area and areas where CDBG funds are proposed to be used.

Yes ☒ **No** ☐ State / County (Metro City)

Yes ☐ **No** ☒ HOPWA Metropolitan Statistical Area (MSA) if applicable

Yes ☒ **No** ☐ Public Housing Authority and/or Public Housing Agencies, including participation of residents of public and assisted housing developments (including any resident advisory boards, resident councils, and resident management corporations).

Yes ☐ **No** ☒ Does the plan identify any of the agency types described above that were not consulted and provide a rationale for not consulting?

Yes ☒ **No** ☐ Does the plan describe other local/regional/state/federal planning efforts

considered when preparing the plan? (**Note:** Continuum of care must be described; additional efforts are encouraged but not grounds for disapproval of a plan.)

Yes ☒ **No** ☐ With respect to the public entities involved, does the plan describe the means of cooperation among the state and local units of government in the metropolitan area in the implementation of the plan? This can be demonstrated by checking boxes on the table to indicate which agencies consulted with meet this description.

AFH Specific:

Yes ☐ **No** ☒ Describes consultation with PHAs operating in the jurisdiction on strategies for affirmatively furthering fair housing, and on proposed actions to affirmatively further fair housing in the consolidated plan.

Yes ☐ **No** ☒ Describes consultation with community-based and regionally-based organizations that represent protected class members, and organizations that enforce fair housing laws, such as fair housing enforcement agencies, including participants in the:

____ Fair Housing Assistance Program (FHAP);

____ Fair housing organizations;

____ Nonprofit organizations that receive funding under the Fair Housing Initiative Program (FHIP); and

____ Other public and private fair housing service agencies, to the extent that such entities operate within the grantee's area.

Yes ☐ **No** ☒ If applicable, describes consultation with regional government agencies in addition to adjacent units of general local government and local government agencies, including local government agencies with metropolitan-wide planning and transportation responsibilities, particularly for problems and solutions that go beyond a single jurisdiction.

Comments/Verification: _____

AP-12: Citizen Participation §91.105, §91.200(c)

Yes ☒ **No** ☐ Does the plan include a description of the development of the plan and efforts to broaden public participation, including the names of organizations involved in the development of the plan? See also AP-05.

Yes ☒ **No** ☐ Is there a summary of the citizen participation process in the chart provided, and were the public hearing and comment period requirements satisfactory?

Yes ☒ **No** ☐ Are citizen comments included in the plan, and are the comments specifically and adequately addressed by the grantee? Note: If no comments received check the yes box but there must be a narrative statement indicating no comments received.

Yes ☒ **No** ☐ Does the grantee provide a summary of comments not accepted and reasons for not accepting them in the chart provided?

Yes ☐ **No** ☒ According to the table provided, did the grantee explore alternative public involvement techniques and the review of program performance (e.g. the use of focus groups or the Internet?)
 Note: This is encouraged, but not grounds for disapproval of the plan.

Note: The Grantee shall encourage the participation of local and regional institutions, the Continuum of Care, and other organization (including businesses, developers, non-profit organizations, philanthropic organizations, community, and faith-based organizations) in the process of developing and implementing the plan (91.105(a)(2)(ii). The grantee shall encourage the participation of low and moderate income persons residing in slum/blighted areas, residents in predominantly low and moderate income areas, and public housing residents. A jurisdiction is also expected to take whatever actions are appropriate to encourage the participation of all its citizens, including minorities and non-English speaking persons, as well as persons with disabilities.

Comments/Verification: We emailed the public meeting notice to over 400 non/profit, for profit, and faith-based organizations.

AP Screens: Action Plan §91.220

AP Screens contain prepopulated field containing information entered by the grantee in the NA, MA and SP screens. To change prepopulated information in AP screens, the grantee must first update their NA, MA or SP screen.

AP-15: Expected Resources §91.220(c)(1,2)

Note: Greyed out information on the AP-15 screen is not editable. To change this information, the grantee must edit the SP-35 screen first.

Yes ☒ **No** ☐ In the chart provided, does the plan include the Annual Allocation, Program Income, Prior Year Resources, and Expected Amount Available for the remainder of the Con Plan for each identified funding source, (CDBG, HOME, ESG and HOPWA as appropriate, HTF, Section 8 funds, low income housing tax credits, and competitive McKinney-Vento Homeless Assistance Act funds) and other resources from private, state, and local sources that are reasonably expected to be made available to address the needs identified in the plan?

Yes ☒ **No** ☐ Annual Allocation

Yes ☒ **No** ☐ Program Income

Yes ☒ **No** ☐ Prior Year Resources

Yes ☒ **No** ☐ Expected Amount Available for remainder of Con Plan

Yes ☒ **No** ☐ Does the plan explain how federal funds will leverage additional resources (private, state and local funds), including a description of how match requirements will be satisfied?

Review Match Requirements:

Yes ☒ **No** ☐ HOME: 25% match on all expenditures except planning and admin, CHDO operating, CHDO capacity building, and CHDO project specific expenses when repayment is waived by the PJ under §92.301.

Entitlement Action Plan Checklist

January 2018

Yes ☒ **No** ☐ ESG: 100% match on all expenditures must be provided after the date that HUD signs the grant agreement. Cash, non-cash, and program income must meet requirements of § 576.201.

Yes ☐ **No** ☒ CDBG-DR Specific: Does the plan include CDBG-DR as a source of funding if the community was a recipient of federal disaster assistance?

Comments/Verification: _____

AP-20: Annual Goals & Objectives §91.220(c)(3) & (e)

Yes ☒ **No** ☐ Does the plan contain a summary of the annual objectives the grantee expects to achieve during the forthcoming program year? *Note: Annual goals are a subset of the Strategic Plan goals described in SP-45*

Yes ☒ **No** ☐ Does the plan include outcome measures for activities included in the AP in accordance with guidance issued by HUD?

Yes ☐ **No** ☒ CDBG- DR Specific: Does the plan include annual goals for activities that received CDBG-DR funding if the community received federal disaster assistance?

Yes ☐ **No** ☒ AFH Specific: Does the grantee specify one-year goals that will address fair housing goals identified in the AFH?

Comments/Verification: _____

AP-35: Projects § 91.220(d)

Note: It is important that all CDBG, HOME and ESG funds be covered by the action plan, that the source of all such funds be clearly identified in the action plan, and that the planned use of all such funds for activities (and allowable contingencies) is shown in the action plan. In reviewing action plans, HUD should check that there is a balance between the sources of funds listed in the action plan and the amounts budgeted for the individual activities. A check should also be made to ensure that the amounts listed as sources match the amount of estimated funding listed in the corresponding SF-424. If there is a discrepancy between any of these figures, the grantee should be contacted immediately for clarification and correction.

Yes ☒ **No** ☐ Did the grantee create new projects for the upcoming program year? If a grantee copied an AAP, IDIS will automatically copy projects for the prior year. All prior year projects should be deleted and new projects created for the program year. Failure to do so will result in duplicate projects in IDIS. Return plan to grantee to make corrections.

Yes ☐ **No** ☒ AFH specific: AFH goals receiving CPD funds are documented as a project(s).

Yes ☐ **No** ☒ AFH Specific: If desired, projects in AFH geographic priority areas are identified.

Yes ☒ **No** ☐ Does the plan provide a description of the activities the grantee will undertake

during the next year to address priority needs and objectives?

- Estimate the number and types of families (including income level) that will benefit from the proposed activities?
- Describe the specific local objectives and priority needs that will be addressed by the activities using formula grant funds and program income the grantee expects to receive during the program year?

Note: These needs are described on SP-25. Projects planned to address homeless and other special needs may also be addressed on AP-65 in the discussion text box. AP-35 describes the activities for the year in each project, including projects users plan to undertake relative to this requirement. Individual project details can be viewed by clicking "view" next to each project entry on this screen. An overview of project details can be seen by clicking "View Summary" at the bottom of the table on this screen.

Yes ☐ No ☒ Describe proposed accomplishments, and target date for completion of the activity?

Yes ☒ No ☐ Does the plan include a description of activities for all CDBG funds (including program income and proceeds from Section 108 guarantees, etc.) HOME funds and ESG funds expected to be available?

Yes ☒ No ☐ Are CDBG, HOME and ESG activity descriptions in sufficient detail, including location, to allow citizens to determine the degree to which they are affected?

Yes ☒ No ☐ Does the plan indicate the reasons for allocation priorities and any obstacles to addressing underserved needs?

Yes ☐ No ☒ CDBG- DR Specific: If the community received federal disaster, does the plan reference CDBG-DR allocation priorities in the text box on this screen and provide a link to the grantee's website where it's CDBG-DR Action Plan is posted as a resource for parties that wish to find out more?

Expenditure Limits

Note: A "yes" response to any Expenditure Limit question is not grounds for disapproval.

Yes ☐ No ☒ Has the grantee's budget exceeded the 20% administrative cap for CDBG?

Yes ☐ No ☒ Has the grantee's budget exceeded the 15% public service cap for CDBG?

Yes ☐ No ☒ Has the grantee's budget exceeded the 10% administrative cap for HOME?

Yes ☐ No ☒ Has the grantee's budget met the 15% CHDO set-aside for HOME?

Yes ☐ No ☒ Has the grantee's budget exceeded the 3% administrative cap for HOPWA or the 7% administrative cap by project sponsors under HOPWA?

Yes ☐ No ☒ Has the grantee's budget exceeded the 7.5% administrative cap for Emergency Solutions Grant?

Yes ☐ No ☒ Does the amount of ESG funds budgeted for street outreach and emergency shelter activities exceed the greater of 60% of the jurisdiction's fiscal year ESG grant or the amount of FY 2010 ESG funds committed for homeless assistance activities?

Comments/Verification: _____

AP-50: Geographic Distribution §91.220(f)

For local jurisdictions, this screen is only required if geography was used to determine funding allocation priorities or if it identified one or more target areas in the Strategic Plan. To add a new priority area a grantee must update the SP-10 Geographic Priorities in their most recently approved consolidated plan.

Yes ☒ No ☐ Does the plan include a description of the geographic areas of the jurisdiction (including areas of low-income and minority concentration) where assistance will be directed?

Yes ☒ No ☐ If applicable, does the grantee estimate the percentage of funds they plan to dedicate to target areas?

Yes ☒ No ☐ Does the plan provide the rationale for the priorities for allocating investment geographically?

Yes ☐ No ☒ If the grantee is requesting approval of a Neighborhood Revitalization Strategy Area, does it meet the requirements of CPD Notice 16-16 and include outcomes? *Note: Separate documentation should be maintained to verify compliance with CPD Notice 16-16. Any documents needed to seek approval of an NRSA should also be included as attachments on the AD-25 screen.*

Comments/Verification: _____

AP-55: Affordable Housing Goals §91.220(g)

Yes ☒ No ☐ Does the plan specify one-year goals for the number of households to be provided affordable housing through activities that provide rental assistance, production of new units, rehabilitation of existing units, or acquisition of existing units using funds made available to the grantee, including affordable housing goals to be accomplished with CDBG-DR funding if applicable?

Yes ☐ No ☒ CDBG-DR Specific: Does the grantee specify one-year goals for the number of homeless, non-homeless, and special needs households to be provided affordable housing units using funds made available to the grantee, including if applicable, affordable housing goals to be accomplished with CDBG-DR funding? The grantee must include annual goals for CDBG-DR funds; however, they do not require that they include affordable housing goals if the grantee does not select this as an activity

Yes ☐ **No** ☒ AFH Specific: Does the grantee specify one-year goals that will address fair housing goals identified in the AFH?

Note: Pay attention to the accuracy of these goals since they will automatically pre-populate corresponding CAPER screens. The term affordable housing shall be as defined in 24 CFR 92.252 for rental housing and 24 CFR 92.254 for homeownership. These estimates should not include the provision of emergency shelter, transitional shelter, or social services.

Comments/Verification: _____

AP-60: Public Housing §91.220(h)

Yes ☒ **No** ☐ Does the grantee describe actions it plans to take to address the needs of public housing?

Yes ☒ **No** ☐ Does the plan discuss actions planned to encourage public housing residents to become more involved in management and participate in homeownership?

Yes ☐ **No** ☒ If the public housing agency is designated as "troubled" by HUD, does the grantee must describe the way it will provide financial or other assistance to improve its operations and remove the "troubled" designation?

Note: Consult with Public and Indian Housing representative to determine whether Public Housing Authority is designated as "troubled."

Comments/Verification: _____

AP-65: Homeless & Other Special Need Activities §91.220(i)

Yes ☒ **No** ☐ Does the grantee describe its one-year goals and specific action steps for reducing and ending homelessness through:

- _____ Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs
- _____ Addressing the emergency shelter and transitional housing needs of homeless persons
- _____ Helping homeless person (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again?
- _____ Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals who are:
 - _____ Being discharged from publicly funded institutions and systems of care, such as health-care facilities, mental health facilities, foster care or other youth facilities, corrections programs and institutions?
 - _____ Receiving assistance from public or private agencies that address housing, health, social services, employment, education or youth needs?

Yes ☒ **No** ☐ Does the grantee specify the activities it plans to undertake during the next year to address the housing and supportive service needs for persons who are not homeless but have other special needs (i.e. elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with alcohol or other drug additions), person with HIV/AIDS and their families, and public housing residents)? Also, see AP 35.

Note: AP-65 does not specifically call out the needs described here or in §91.215(e). Users must discuss in the discussion text box. AP-35 describes the activities for the year, including projects users plan to undertake relative to this requirement. Additional annual goal information such as numeric/quantity etc. can be seen on the AP-20 screen by clicking "view" next to each individual goal on that screen or by clicking "View Summary" below the goal table on AP-20

Comments/Verification: _____

AP-70: HOPWA Goals §91.220(i)(3)

Yes ☒ **No** ☐ Does the grantee directly administer HOPWA funds? If no, AP-70 should not be included in their Con Plan template and the checklist elements in this section can be ignored.

Yes ☒ **No** ☐ Does the plan describe the grantee's one-year goals for the number of households to be provided housing using HOPWA for: Short-term rent, mortgage and utility assistance payments; Tenant based rental assistance; Units provided in permanent housing facilities developed, leased or operated with HOPWA funds; and Units provided in transitional short-term housing facilities developed, leased or operated with HOPWA funds?

Comments/Verification: _____

AP-75: Barrier to Affordable Housing §91.220(j)

Yes ☒ **No** ☐ Does the grantee describe actions it plans to take to remove or ameliorate the negative effect of public policies that serve as barriers to affordable housing? Such policies, procedures, and processes include but are not limited to: land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. Refer to the con plan MA-40 and SP-55 screens in to determine if response align to the proposed actions.

Comments/Verification: _____

AP-85: Other Actions §91.220(k)

Yes ☒ **No** ☐ Does the plan discuss actions the grantee plans to take to address obstacles to meeting underserved needs?

Yes ☒ **No** ☐ Does the plan discuss actions planned to foster and maintain affordable housing?

Yes ☒ **No** ☐ Does the plan discuss actions planned to reduce lead-based paint hazards?

Yes ☒ **No** ☐ Does the plan discuss actions the grantee plans to take to develop the institutional

Yes ☒ **No** ☐ Does the plan discuss actions the grantee plans to take to reduce the number of poverty-level families?

Yes ☒ **No** ☐ Does the plan discuss actions the grantee plans to take to enhance coordination between public and private housing and social service agencies?

Note: With respect to economic development, the plan should describe actions that will take place to enhance coordination with private industry, businesses, developers, and social services agencies.

Comments/Verification: _____

AP-90: Program-Specific Requirements – CDBG §91.220(l)(1)

Yes ☒ **No** ☐ Does the AP include a description of CDBG funds expected to be available during the program year, including the following:

- _____ any program income that will have been received before the start of the next program year and that has not yet been programmed;
- _____ proceeds from Section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in its strategic plan;
- _____ surplus from urban renewal settlements;
- _____ grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan; or
- _____ any income from float-funded activities?

Yes ☒ **No** ☐ Does the AP identify the estimated percentage of CDBG funds that will be used for activities that benefit persons of low-and moderate-income?

Comments/Verification: _____

AP-90: Program-Specific Requirements – HOME §91.220(l)(2)

If the grantee does not directly administer HOME funds, this section of AP-90 should not be included in their Con Plan template and this section of the checklist elements can be ignored.

Yes ☒ **No** ☐ Does the plan provide for engaging in forms of investment which are not described in 24 CFR 92.205?

Note: "HUD's specific written approval to the jurisdiction is required for other forms of investment, as provided in §92.205(b). Approval of the consolidated plan or action plan under §91.500 or the failure to disapprove the consolidated plan or action plan does not satisfy the requirement for specific HUD approval for other forms of investment."

HOME Resale & Recapture Requirements

Note: Approval of the consolidated plan or action plan under §91.500 or the failure to disapprove the consolidated plan or action does not satisfy the requirement for specific HUD approval for resale or recapture guidelines.

A1: If the PJ proposes to use any HOME funds for assisting homebuyers (whether through down payment assistance, new construction or rehabilitation), does the Annual Action Plan include resale or recapture provisions?

☒ Yes ☐ No Verification found on page/screen – **Attachment 8**

Explanation: PJs must submit resale or recapture provisions to HUD for review and approval before using any HOME funds for this purpose. HUD must determine that the provisions meet the requirements established in 24 CFR 92.254(a) (5) (i) and (ii).

Field Office Action: If yes, continue to Question A2. If no, you must contact the PJ and ask that it submit the resale and/or recapture provisions before the end of the 45-day Annual Action Plan review period or you must inform the PJ in writing in the Annual Action Plan approval letter that it may not use any HOME funds for homebuyer assistance until it has submitted and HUD has approved the resale and/or recapture provisions to be used.

A2: If the PJ will use subrecipients, State recipients, urban county or consortium members, CHDOs or other entities to provide the homebuyer assistance, did the PJ submit the resale or recapture provisions to be used by these entities to HUD for review as part of the Annual Action Plan?

☒ Yes ☐ No Verification found on page/screen – **Attachment 8**

Explanation: All resale or recapture provisions to be used in a PJ's program must be reviewed and approved by HUD before the PJ can use any HOME funds for homebuyer projects using those provisions.

Field Office Action: If yes, proceed with your review. If no, you must contact the PJ and ask that it submit the resale and/or recapture provisions to be used by one or more of these entities before the end of the 45-day Annual Action Plan review period. If this is not possible or the PJ fails to respond or submit an acceptable revision, you must inform the PJ in the Annual Action Plan approval letter that HUD is disapproving its resale and/or recapture provisions and the entity may not use any HOME funds to undertake any activities related to homebuyer assistance until the PJ has submitted and HUD has approved the resale and/or recapture provisions to be used.

A3: If the PJ proposes to use more than one set of provisions (e.g., both resale and recapture, different sets of recapture provisions), does the Annual Action Plan provide an explanation of the circumstances under which each form will be used?

☒ Yes ☐ No Verification found on page/screen – **Attachment 8**

Explanation: For example, a PJ may use recapture provisions for its HOME down-payment assistance program, but impose resale provisions on homebuyer units newly constructed with HOME funds by its CHDO. The Annual Action Plan must explain when it will use each set of provisions.

Field Office Action: If yes or N/A, proceed with your review. If no, you must contact the PJ and ask that it revise its discussion of its resale and/or recapture provisions to include an explanation of the circumstances under which each set of provisions will be used before the end of the 45-day Annual Action Plan review period. If this is not possible or the PJ fails to respond or submit an acceptable revision within the review period, you must inform the PJ in the Annual Action Plan approval letter that HUD is disapproving its resale and/or recapture provisions and it may not use any HOME funds to undertake any activities related to homebuyer assistance until the PJ has submitted and HUD has approved the resale and/or recapture provisions to be used.

B1: Do the recapture provisions reflect one of the following models?

1. PJ recaptures entire amount;
2. Pro rata reduction of recapture amount during affordability period;
3. Owner recovers entire investment (down payment and capital improvements) before PJ recaptures HOME investment;
4. Shared net proceeds in event of insufficient net proceeds;
5. PJ-developed or modified provisions.

☒ Yes ☐ No Verification found on page/screen

Explanation: Recapture provisions permit the HOME-assisted homebuyer to sell their unit at any time during the period of affordability, to any willing buyer, and at the price the market will bear. The PJ imposes recapture provisions by written agreement and by recorded lien. In the event of a voluntary or involuntary sale during the period of affordability, the PJ must recapture the amount specified under its recapture provisions. The HOME regulations at 24 CFR 92.254(a)(5)(ii)(A) list four acceptable recapture models and permit PJs to adopt, develop or modify their own recapture requirements for HUD approval.

B2: Are the provisions described in adequate detail for the HUD Reviewer and interested members of the public to understand the PJ's method for recapturing funds?

☒ Yes ☐ No Verification found on page/screen

Explanation: The Annual Action Plan must describe the recapture provision(s) to be used in sufficient detail for HUD and the public to understand which provisions it has chosen and how they will be implemented. Provisions that simply cite or repeat HOME regulations are not acceptable. The provisions must be described in the Annual Action Plan. Similarly, if the PJ has developed its own provisions or made modifications to the regulatory models, it must describe those provisions in sufficient detail.

Field Office Action: If yes, proceed with your review. If no, you must contact the PJ and ask that it revise its discussion of its recapture provisions to include sufficient detail to permit HUD and the public to understand the recapture requirements being adopted. If this is not possible or the PJ fails to respond or submit an acceptable revision within the 45-day review period, you must inform the PJ in the Annual Action Plan approval letter that HUD is disapproving its recapture provisions and it may not use any HOME funds to undertake any activities related to homebuyer assistance until the PJ has submitted and HUD has approved the recapture provisions to be used.

B3: Do the provisions indicate that the amount subject to recapture is the direct subsidy received by the homebuyer?

☒ Yes ☐ No Verification found on page/screen

Explanation: Direct subsidy includes HOME investment that enabled the homebuyer to purchase the property. This includes down payment assistance, closing costs or other HOME assistance provided directly to the homebuyer and/or the difference between the fair market value of the property and a reduced sales price attributable to HOME development assistance. Development subsidies (i.e., the difference between the cost of producing the unit and the fair market value of the unit) cannot be subject to recapture since the homebuyer did not realize a direct benefit from these funds.

Field Office Action: If yes, proceed with your review. If no, you must contact the PJ and ask that it revise its recapture provisions to state that only direct subsidy to the homebuyer is subject to recapture. If this is not possible or the PJ fails to respond or submit an acceptable revision within the 45-day review period, you must inform the PJ in the Annual Action Plan approval letter that HUD is disapproving its recapture provisions and it may not use any HOME funds to undertake any activities related to homebuyer assistance until the PJ has submitted and HUD has approved the recapture provisions to be used.

B4: Do the provisions limit the amount to be recaptured to the net proceeds available from the sale?

☒ Yes ☐ No Verification found on page/screen

Explanation: The net proceeds are the sales price minus loan repayment (other than HOME funds) and closing costs. The PJ must limit the amount subject to recapture to the net proceeds available from the sale. This limitation applies to all units regardless of the type of recapture provisions used or to the nature of the sale (voluntary sales including short sales, and involuntary sales including foreclosures). Any recapture provisions that do not explicitly include this limitation are unacceptable and cannot be approved.

Field Office Action: If yes, proceed with your review. If no, you must contact the PJ and ask that it revise its recapture provisions to state that its recapture provisions limit the amount to be recaptured to the net proceeds of the sale. If this is not possible or the PJ fails to respond or submit an acceptable revision within the 45-day review period, you must inform the PJ in the Annual Action Plan approval letter that HUD is disapproving its recapture provisions and it may not use any HOME funds to undertake any activities related to homebuyer assistance until the PJ has submitted and HUD has approved the recapture provisions to be used.

C1: Does the resale provision limit resale of the property during the HOME period of affordability only to a buyer whose family qualifies as a low-income family?

☒ Yes ☐ No Verification found on page/screen

Explanation: Resale Provisions preserve the affordability and availability of the HOME-assisted homebuyer unit to low-income households for the entire period of affordability. The PJ controls the resale price by establishing an objective methodology for determining what is a fair return to the original homebuyer, in an effort to make the property affordable to a reasonable range of low-income homebuyers. If the established resale price is not affordable to the subsequent low-income homebuyer, the PJ may be required to provide additional assistance to that homebuyer – but may not adjust the resale price as a result. Resale provisions that permit resale of a HOME-assisted unit to a subsequent homebuyer who is not low-income – regardless of the circumstance – are not acceptable. Resale provisions that provide a recapture option to facilitate sale to a subsequent buyer who is not income-eligible (i.e., resale/recapture hybrids) are not acceptable.

Field Office Action: If yes, proceed with your review. If no, you must contact the PJ and ask that it revise its resale provision to state that the housing may only be resold to a family that qualifies as low-income. If this is not possible or the PJ fails to respond or submit an acceptable revision within the 45-day review period, you must inform the PJ in the Annual Action Plan approval letter that HUD is disapproving its resale provisions and it may not use any HOME funds to undertake any activities related to homebuyer assistance until the PJ has submitted and HUD has approved the resale provisions to be used.

C2: Does the provision contain a specific definition of "fair return on investment?"

☒ Yes ☐ No Verification found on page/screen

Explanation: The provision describes in detail what return homebuyers can expect if they sell their unit during the period of affordability. The PJ is expected to identify an objective standard or index that will determine "fair return" on resale. (See C3)

Field Office Action: If yes, proceed with your review. If no, you must contact the PJ and ask that it revise its resale provision to include a definition of "fair return on investment." If this is not possible or the PJ fails to respond or submit an acceptable revision within the 45-day review period, you must inform the PJ in the Annual Action Plan approval letter that HUD is disapproving its resale provisions and it may not use any HOME funds to undertake any activities related to homebuyer assistance until the PJ has submitted and HUD has approved the resale provisions to be used.

C3: Is fair return based upon an objective index or standard?

☒ Yes ☐ No Verification found on page/screen

Explanation: An objective standard or index is concrete and publicly accessible and can be easily measured at the time of original purchase and at resale. Examples include: a percentage of the change in median sales prices over the period of ownership, the percentage change in area median income over the period of ownership, and the percentage change in the Consumer Price Index over the period of ownership. In depressed or declining markets, a loss on investment can constitute a fair return. A standard that ties the return to the original homebuyer to the price that a specific homebuyer or a defined group of low-income homebuyers are able to pay does not constitute fair return and is not acceptable.

Field Office Action: If yes, proceed with your review. If no, you must contact the PJ and ask that it revise its resale provisions to specify the standard or index that will be applied upon resale to provide a fair return to the homebuyer. If this is not possible or the PJ fails to respond or submit an acceptable revision within the 45-day review period, you must inform the PJ in the Annual Action Plan approval letter that HUD is disapproving its resale provisions and it may not use any HOME funds to undertake any activities related to homebuyer assistance until the PJ has submitted and HUD has approved the resale provisions to be used.

C4: Does the basis upon which fair return is calculated include the homebuyer's original investment in the property and the increase in market value attributable to homebuyer investments in or capital improvements to the property?

☒ Yes ☐ No Verification found on page/screen

Explanation: The provision must specifically state that the basis for calculating fair return is the original investment by the homebuyer and specific types of upgrades or additions that will add value to the property. (Generally, replacing worn or dated components such as appliances or carpet would not be considered an improvement that adds value). The provision must address the types of changes that it will or will not include in that basis.

Field Office Action: If yes, proceed with your review. If no, you must contact the PJ and ask that it revise its resale provisions so that homebuyer investment includes both the homebuyer-provided down payment and homebuyer-financed improvements that would increase the value of the home. If this is not possible or the PJ fails to respond or submit an acceptable revision within the 45-day review period, you must inform the PJ in the Annual Action Plan approval letter that HUD is disapproving its resale provisions and it may not use any HOME funds to undertake any activities related to homebuyer assistance until the PJ has submitted and HUD has approved the resale provisions to be used.

D1: If the PJ plans to use a presumption of affordability instead of enforcement mechanisms to meet the resale requirement, does the resale provision identify specific neighborhoods that will be subject to the presumption of affordability?

☐ Yes ☐ No Verification found on page/screen **n/a**

Explanation: A presumption of affordability cannot be sought or approved for an entire PJ. The presumption can only be made on a neighborhood basis.

Field Office Action: If yes, proceed with your review. If the presumption is not neighborhood or neighborhood(s)-specific, you must reject the presumption, and prohibit the PJ from using any HOME funds without imposing either resale or recapture requirements. The PJ may resubmit a new presumption request for HUD's approval at any time during the program year. If this is not possible or the PJ fails to respond or submit an acceptable revision within the 45-day review period, you must inform the PJ in the Annual Action Plan approval letter that HUD is disapproving its resale provisions and it may not use any HOME funds to undertake any activities related to homebuyer assistance until the PJ has submitted and HUD has approved the resale provisions to be used.

D2: If this is a new request or renewal of a presumption issued previously, does the PJ submit a recent market analysis for each neighborhood for which approval of the presumption of affordability is sought?

☐ Yes ☐ No Verification found on page/screen **n/a**

Explanation: The PJ must submit a separate market analysis for each neighborhood for which it seeks approval of a presumption of affordability, except that it can perform a combined market analysis for a limited number of contiguous neighborhoods that are similarly situated with respect to demographic profile, housing market, and economic conditions. The analysis must be recent (performed within the last 12 months).

Field Office Action: If yes, proceed with your review. If the PJ did not submit a market analysis, did not submit analyses for all neighborhoods, or submitted analyses that were not completed within the last 12 months, you must contact the PJ and ask that recent market analyses supporting the presumption be submitted. If the analyses are not submitted timely, you must reject the presumption, and prohibit the PJ from using any HOME funds without imposing either resale or recapture requirements. The PJ may resubmit a new presumption request for HUD's approval at any time during the program year.

D3: If the market analysis was originally submitted with a previous year's Annual Action Plan, does the Plan indicate that the PJ has determined that an updated analysis is not warranted by any changes in the neighborhood's market conditions?

☐ Yes ☐ No Verification found on page/screen **n/a**

Explanation: If the PJ becomes aware that significant changes in a neighborhood's market conditions since the preparation of market analysis make continuation of the presumption of affordability inappropriate, it must indicate that in its Annual Action Plan. The PJ must indicate in the Annual Action Plan that, in the absence of significant changes, it is continuing its use of the presumption of affordability for another program year.

Field Office Action: If yes, proceed with your review. If no, you must contact the PJ and ask that it revise and include this information in the presumption section of its Annual Action Plan before continuing your review. If this is not possible or the PJ fails to respond or submit an acceptable revision within the 45-day review period, you must inform the PJ in the Annual Action Plan approval letter that HUD is disapproving its presumption of affordability and it may not use any HOME funds to undertake any activities related to homebuyer assistance until the PJ has submitted and HUD has approved the presumption of affordability.

D4: Does the market analysis include the following:

1. An evaluation of the location and characteristics of the housing and residents in the neighborhood (e.g., sale prices, age and amenities of the housing stock, incomes of residents, percentage of owner-occupants) in relation to housing and incomes in the housing market area?
2. An analysis of the current and projected incomes of neighborhood residents for an average period of affordability for homebuyers in the neighborhood that supports the conclusion that a reasonable range of low-income families will continue to qualify for mortgage financing?

☐ Yes ☐ No Verification found on page/screen **n/a**

Explanation: The market analysis, which can include a combined market analysis for a limited number of contiguous neighborhoods that are similarly situated with respect to demographic profile, housing market, and economic conditions, must contain this evaluation and the analysis of the data must support the conclusion that a reasonable range of low-income families will continue to qualify for mortgage financing.

Field Office Action: If yes, proceed with your review. If no, you must contact the PJ and request that an acceptable market analysis be submitted. If the analysis is not submitted timely, you must reject the presumption, and prohibit the PJ from using any HOME funds without imposing either resale or recapture requirements. The PJ may resubmit a new presumption request for HUD's approval at any time during the program year.

D5: Does the information presented in the market analysis support the PJ's conclusion that the following conditions are likely to be met in the event of a resale of the HOME-assisted housing located in the neighborhood during the affordability period without the imposition of enforcement mechanisms by the PJ:

- the housing will be available and affordable to a reasonable range of low-income homebuyers;
- a low-income homebuyer will occupy the housing as a principal residence; and
- The original owner will be afforded a fair return on investment?

☐ Yes ☐ No Verification found on page/screen **n/a**

Explanation: The market analysis must support the conclusion that housing may be presumed to meet the resale restrictions. If the analysis is flawed or does not support this conclusion, the HUD Field Office must disapprove the presumption of affordability.

Field Office Action: If yes and all other requirements related to the presumption have been met, you may approve the presumption of affordability. If no, you must reject the presumption of affordability and require the use of approved resale or recapture provisions in the neighborhood(s).

Does the PJ intend to use HOME funds to refinance existing debt secured by multi-family housing which is being rehabilitated with HOME funds?

☐ Yes ☐ No Verification found on page/screen **n/a**

If so, does the AP explain what refinancing guidelines will be used? These guidelines must describe the conditions under which the PJ will refinance existing debt. At a minimum, the guidelines must:

- Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and

refinancing.

- Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated
 - State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.
 - Specify the required period of affordability, whether it is a minimum 15 years or longer.
 - Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(g) or a federally designated Empowerment Zone or Enterprise Community.
 - State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including the CDBG program.

☐ Yes ☐ No Verification found on page/screen **n/a**

Documentation related to the following requirements should be included with any other "Grantee Specific Appendices" under attachments on AD-25. If not attached, document where in the plan was this was described.

If the PJ intends to use HOME funds for homebuyer assistance or for rehabilitation of owner-occupied single family housing and does not use the HOME affordable homeownership limits for the area provided by HUD, did it determine 95 percent of the median area purchase price and set forth the information in accordance with 24 CFR 92.254(a)(2)(iii).

Yes ☐ No ☐ N/A ☒ Comment _____

Did the PJ describe eligible applicants (e.g., categories of eligible applicants), its process for soliciting and funding applications or proposals (e.g., competition, first-come first-serve) and where detailed information may be obtained (e.g., application packages are available at the office of the jurisdiction or on the jurisdiction's Web site).

Yes ☐ No ☐ N/A ☒ Comment _____

If the PJ planned to limit the beneficiaries or give preferences to a particular segment of the low-income population, was a description of that limitation or preference described in the action plan?

Yes ☐ No ☐ N/A ☒ Comment _____

Note: Any limitation or preference must not violate nondiscrimination requirements in 24 CFR 92.350, and the participating jurisdiction must not limit or give preferences to students. A limitation or preference may include, in addition to targeting tenant-based rental assistance to persons with special needs, as provided in 24 CFR 92.209(c)(2), limiting beneficiaries or giving preferences to such professions as police officers, teachers, or artists. The PJ must not limit beneficiaries or give a preference to all employees of the jurisdiction. The PJ may permit rental housing owners to limit tenants or give a preference in accordance with 24 CFR 92.253(d) only if such limitation or preference is described in the action plan.

Comments/Verification: _____

AP-90: Program-Specific Requirements – ESG §91.220(l)(4)

If the grantee receives ESG and funds subrecipients, this section should be completed.

If the grantee does not directly receive ESG funds, this section of AP-90 should not be included in their Con Plan template and the ESG checklist elements can be ignored.

Yes ☒ **No** ☐ Does the grantee include its written standards for providing ESG assistance? See 24 CFR 576.400(e)(1) and (e)(3) for the minimum standards.

Yes ☒ **No** ☐ If the Continuum of Care for the jurisdiction has established a centralized or coordinated assessment system that meets HUD requirements, Does the grantee describe that system?
Note: The requirements for using a centralized or coordinated assessment system, including the exception for victim service providers, are set forth under 24 CFR 576.400(d).

Yes ☒ **No** ☐ Does the grantee identify its process for making sub-awards and describe how the grantee intends to make its allocation available to private nonprofit organizations, including community and faith-based organizations, and in the case of urban counties, funding to participating units of local government?

Yes ☒ **No** ☐ If the grantee is unable to meet the homeless participation requirement in 24 CFR 576.405(a), does the grantee specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering and making policies and decisions regarding any facilities or services that receive ESG funding?

Yes ☒ **No** ☐ Does the grantee describe its performance standards for ESG activities?

Comments/Verification: _____

AP-90: Program-Specific Requirements – HOPWA §91.220 (I)(3)

Yes ☒ **No** ☐ Does the action plan identify the method for selecting project sponsors (including providing full access to grassroots faith-based and other community organizations)? Note: Due to a system error, this element is omitted from the template. HOPWA grantees should therefore add a text box at the end of this screen to enter this information.

Comments/Verification: _____

AP-90 HTF Specific Review §91.220(I)(5) n/a for City of Tucson

HTF specific requirements – This section does not apply for FY17 plans.

This section only applies to plans submitted on or after January 1, 2018. HUD will release new HTF screen enhancements for FY18.

If the jurisdiction does not directly administer HTF funds, this section of AP-90 should not be included in its Action Plan template and the HTF checklist elements can be ignored. The HTF Allocation Plan must establish the application requirements and the criteria for selection of applications submitted by eligible recipients that meet the jurisdiction's priority housing needs.

1. Does the plan describe the following:

- a. eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2)?
Yes ☐ No ☐ N/A ☐ Comment _____

Entitlement Action Plan Checklist

January 2018

- b. the jurisdiction's application requirements for eligible recipients to apply for HTF funds?
Yes ☐ No ☐ N/A ☐ Comment _____
- c. the selection criteria that the jurisdiction will use to select applications submitted by eligible recipients?
Yes ☐ No ☐ N/A ☐ Comment _____
- d. the jurisdiction's required priority for funding based on geographic distribution, which is a description of the geographic areas of the State (including areas of low-income and minority concentration) in which it will direct assistance during the ensuing program year?)
Yes ☐ No ☐ N/A ☐ Comment _____
- e. the grantee's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner?
Yes ☐ No ☐ N/A ☐ Comment _____
- f. the jurisdiction's required priority for funding based on the extent to which rents for units in the rental project are affordable to extremely low-income families?
Yes ☐ No ☐ N/A ☐ Comment _____
- g. the jurisdiction's required priority for funding based on the financial feasibility of the project beyond the required 30-year period?
Yes ☐ No ☐ N/A ☐ Comment _____
- h. the jurisdiction's required priority for funding based on the merits of the application in meeting the priority housing needs of the jurisdiction (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations)?
Yes ☐ No ☐ N/A ☐ Comment _____
- i. the jurisdiction's required priority for funding based on the location of existing affordable housing?
Yes ☐ No ☐ N/A ☐ Comment _____
- j. the jurisdiction's required priority for funding based on the extent to which the application makes use of non-federal funding sources?
Yes ☐ No ☐ N/A ☐ Comment _____

Note: Overall, Did the jurisdiction describe eligible applicants (e.g., categories of eligible applicants), its process for soliciting and funding applications or proposals (e.g., competition, first-come first-serve) and where detailed information may be obtained (e.g., application packages are available at the office of the jurisdiction or on the jurisdiction's Web site).

2. Does the plan specify if the jurisdiction will require the applicant to include a description of the eligible activities to be conducted with HTF funds? If the jurisdiction will not distribute funds by selecting applications submitted by eligible recipients, ignore this element.
Yes ☐ No ☐ N/A ☐ Comment _____
3. Does the plan specify if the jurisdiction will require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements?
Yes ☐ No ☐ N/A ☐ Comment _____

4. Performance Goals Benchmarks:

Did the plan provide for performance goals and benchmarks against which the jurisdiction will measure its progress, consistent with the jurisdiction's goals established under 24 CFR 91.215(b)(2)? The jurisdiction has met this requirement by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objective screens.

Yes ☐ No ☐ N/A ☐ Comment _____

5. Rehabilitation Standards:

Submission of the jurisdiction's rehabilitation standards is required only if the jurisdiction intends to use its HTF funds for the rehabilitation of housing. If the jurisdiction will not undertake HTF-funded rehabilitation activities, you can ignore this element.

- a. Does the plan contain rehabilitation standards that all HTF-assisted housing undergoing rehabilitation must meet at the time of project completion in accordance with § 93.301(b)?
- b. Does the plan describe rehabilitation standards in enough detail on what work is required?
- c. Does the plan describe rehabilitation standards in enough detail on how the work should be performed?
- d. Does the plan describe rehabilitation standards in enough detail on what materials should be used?

Yes ☐ No ☐ N/A ☐ Comment _____

Do the rehabilitation standards address the following property standard requirements?

- a. Health and safety?
- b. Major systems?
- c. Lead-Based Paint?
- d. Accessibility?
- e. Disaster Mitigation (where relevant)?
- f. State and local Codes, Ordinances, and Zoning Requirements?
- g. Inspectable Areas and Observable Deficiencies from HUD's Uniform Physical Condition Standards identified by HUD as applicable to HTF-assisted housing?
- h. Capital Needs Assessment (if applicable)

Yes ☐ No ☐ N/A ☐ Comment _____

6. Resale or Recapture Guidelines:

Does the plan provide a description of the guidelines that will be used for resale or recapture of HTF funds when used for homebuyer activities as required in 24 CFR 93.305(b)? Submission of the guideline are only required if the jurisdiction will use HTF funds to assist first-time homebuyers.

Yes ☐ No ☐ N/A ☐ Comment _____

Note: Remember to complete the recapture/resale checklist below. Approval of the consolidated plan or action plan under §91.500 or the failure to disapprove the consolidated plan or action does not satisfy the requirement for specific HUD approval for resale or recapture guidelines.

7. HTF Affordable Homeownership Limits:

If the jurisdiction intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, did it determine 95 percent of the median area purchase price and set forth the information in accordance with 24 CFR 93.305.

Yes ☐ No ☐ N/A ☐ Comment _____

8. Jurisdiction Limited Beneficiary or Preferences:

If the jurisdiction planned to limit the beneficiaries or give preferences to a segment of the extremely low- or very low-income population, was a description of that limitation or preference described in its consolidated plan or action plan?

Yes ☐ No ☐ N/A ☐ Comment _____

Any limitation or preference must not violate nondiscrimination requirements in 24 CFR 93.350, and the jurisdiction must not limit or give preferences to students. A limitation or preference may include limiting beneficiaries or giving preferences to such professions as police officers, teachers, or artists. The jurisdiction may permit rental housing owners to limit tenants or give a preference in accordance with 24 CFR 93.303(d)(3) only if such limitation or preference is described in the action plan.

9. Refinancing of Existing Debt:

Does the jurisdiction describe plans for using HTF funds to refinance existing debt secured by multifamily housing that is rehabilitated with HTF funds, including a description of the refinancing guidelines required that will be used under § 91.220(l)(5)(H) and § 93.201(b)?

Yes ☐ No ☐ N/A ☐ Comment _____

The requirements for describing the conditions under which the jurisdiction will refinance existing debt include:

- a. Do the guidelines indicate that refinancing of existing debt is only eligible if it is necessary to reduce the overall housing costs and would result in the housing being more affordable and proportional to the number of the HTF-assisted units in the rental project?
- b. Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.
- c. The proportional rehabilitation cost must be greater than the proportional amount of debt that is refinanced.

Yes ☐ No ☐ N/A ☐ Comment _____

HTF RESALE/RECAPTURE REQUIREMENTS**General Review Criteria**

A1: If the jurisdiction proposes to use any HTF funds for assisting homebuyers (whether through down payment assistance, new construction), does the Annual Action Plan include resale or recapture provisions?

☐ Yes ☐ No Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: Jurisdictions must submit resale or recapture provisions to HUD for review and approval before using any HTF funds for this purpose. HUD must determine that the provisions meet the requirements established in 24 CFR 93.305(b)(1) and (b2).

Field Office Action: If yes, continue to Question A2. If no, you must contact the jurisdiction and ask that it submit the resale and/or recapture provisions before the end of the 45-day Annual Action Plan review period or you must inform the jurisdiction in writing in the Annual Action Plan approval letter that it may not use any HTF funds for homebuyer assistance until it has submitted and HUD has approved the resale and/or recapture provisions to be used.

A2: If the jurisdiction proposes to use more than one set of provisions (e.g., both resale and recapture, different sets of recapture provisions), does the Annual Action Plan provide an explanation of the circumstances under which each form will be used?

☐ Yes ☐ No ☐ N/A Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: For example, a jurisdiction may use recapture provisions for its HTF down payment assistance program, but impose resale provisions on homebuyer units newly constructed with HTF funds by its recipient. The Annual Action Plan must explain when it will use each set of provisions.

Field Office Action: If yes or N/A, proceed with your review. If no, you must contact the jurisdiction and ask that it revise its discussion of its resale and/or recapture provisions to include an explanation of the circumstances under which each set of provisions will be used before the end of the 45-day Annual Action Plan review period. If this is not possible or the jurisdiction fails to respond or submit an acceptable revision within the review period, you must inform the jurisdiction in the Annual Action Plan approval letter that HUD is disapproving its resale and/or recapture provisions and it may not use any HTF funds to undertake any activities related to homebuyer assistance until the jurisdiction has submitted and HUD has approved the resale and/or recapture provisions to be used.

Recapture Provisions

Recapture Provisions permit the HTF-assisted homebuyer to sell their unit at any time during the period of affordability, to any willing buyer, and at the price the market will bear. The jurisdiction imposes recapture provisions by written agreement and by recorded lien. In the event of a voluntary or involuntary sale during the period of affordability, the jurisdiction must recapture the amount specified under its recapture provisions.

B1: Do the provisions reflect one of the following models?

- Jurisdiction recaptures entire amount;

- Pro rata reduction of recapture amount during affordability period;
- Owner recovers entire investment (down payment and capital improvements) before jurisdiction recaptures HTF investment;
- Shared net proceeds in event of insufficient net proceeds;
- Jurisdiction-developed or modified provisions.

☐ Yes ☐ No Verification found on page/screen

Comments/Basis for Conclusion (Please Specify which Model):

Explanation: The HTF regulations at 24 CFR 93.305(b)(2) list four acceptable recapture models and permit jurisdictions to adopt, develop or modify their own recapture requirements for HUD approval.

B2: Are the provisions described in adequate detail for the HUD Reviewer and interested members of the public to understand the jurisdiction's method for recapturing funds?

☐ Yes ☐ No ☐ N/A Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: The Annual Action Plan must describe the recapture provision(s) to be used in sufficient detail for HUD and the public to understand which provisions it has chosen and how they will be implemented. Provisions that simply cite or repeat HTF regulations are not acceptable. The provisions must be described in the Annual Action Plan. Similarly, if the jurisdiction has developed its own provisions or made modifications to the regulatory models, it must describe those provisions in sufficient detail.

Field Office Action: If yes, proceed with your review. If no, you must contact the jurisdiction and ask that it revise its discussion of its recapture provisions to include sufficient detail to permit HUD and the public to understand the recapture requirements being adopted. If this is not possible or the jurisdiction fails to respond or submit an acceptable revision within the 45-day review period, you must inform the jurisdiction in the Annual Action Plan approval letter that HUD is disapproving its recapture provisions and it may not use any HTF funds to undertake any activities related to homebuyer assistance until the jurisdiction has submitted and HUD has approved the recapture provisions to be used.

B3: Do the provisions indicate that the amount subject to recapture is the direct subsidy received by the homebuyer?

☐ Yes ☐ No Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: Direct subsidy includes HTF investment that enabled the homebuyer to purchase the property. This includes down payment assistance, closing costs or other HTF assistance provided directly to the homebuyer and/or the difference between the fair market value of the property and a reduced sales price attributable to HTF development assistance. Development subsidies (i.e., the difference between the cost of producing the unit and the fair market value of the unit) cannot be subject to recapture since the homebuyer did not realize a direct benefit from these funds.

Field Office Action: If yes, proceed with your review. If no, you must contact the jurisdiction and ask that it revise its recapture provisions to state that only direct subsidy to the homebuyer is subject to recapture. If this is not possible or the jurisdiction fails to respond or submit an acceptable revision within the 45-day review period, you must inform the jurisdiction in the Annual Action Plan approval letter that HUD is disapproving its recapture provisions and it may not use any HTF funds to undertake any activities related to homebuyer assistance until the jurisdiction has submitted and HUD has approved the recapture provisions to be used.

B4: Do the provisions limit the amount to be recaptured to the net proceeds available from the sale?

☐ Yes ☐ No Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: The net proceeds are the sales price minus loan repayment (other than HTF funds) and closing costs. The jurisdiction must limit the amount subject to recapture to the net proceeds available from the sale. This limitation applies to all units regardless of the type of recapture provisions used or to the nature of the sale (voluntary sales including short sales, and involuntary sales including foreclosures). Any recapture provisions that do not explicitly include this limitation are unacceptable and cannot be approved.

Field Office Action: If yes, proceed with your review. If no, you must contact the jurisdiction and ask that it revise its recapture provisions to state that its recapture provisions limit the amount to be recaptured to the net proceeds of the sale. If this is not possible or the jurisdiction fails to respond or submit an acceptable revision within the 45-day review period, you must inform the jurisdiction in the Annual Action Plan approval letter that HUD is disapproving its recapture provisions and it may not use any HTF funds to undertake any activities related to homebuyer assistance until the jurisdiction has submitted and HUD has approved the recapture provisions to be used.

Resale Provisions

Resale Provisions preserve the affordability and availability of the HTF-assisted homebuyer unit to very low-income households for the entire period of affordability. The jurisdiction controls the resale price by establishing an objective methodology for determining what is a fair return to the original homebuyer, in an effort to make the property affordable to a reasonable range of very low-income homebuyers. If the established resale price is not affordable to the subsequent very low-income homebuyer, the jurisdiction may be required to provide additional assistance to that homebuyer – but may not adjust the resale price as a result.

C1: Does the resale provision limit resale of the property during the HTF period of affordability only to a buyer whose family qualifies as a very low-income family?

☐ Yes ☐ No Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: Resale provisions that permit resale of a HTF-assisted unit to a subsequent homebuyer who is not very low-income – regardless of the circumstance – are not acceptable. Resale provisions that provide a recapture option to facilitate sale to a subsequent buyer who is not income-eligible (i.e., resale/recapture hybrids) are not acceptable.

Field Office Action: If yes, proceed with your review. If no, you must contact the jurisdiction and ask that it revise its resale provision to state that the housing may only be resold to a family that qualifies as very low-income. If this is not possible or the jurisdiction fails to respond or submit an acceptable revision within the 45-day review period, you must inform the jurisdiction in the Annual Action Plan approval letter that HUD is disapproving its resale provisions and it may not use any HTF funds to undertake any activities related to homebuyer assistance until the jurisdiction has submitted and HUD has approved the resale provisions to be used.

C2: Does the provision contain a specific definition of "fair return on investment?"

☐ Yes ☐ No Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: The provision describes in detail what return homebuyers can expect if they sell their unit during the period of affordability. The jurisdiction is expected to identify an objective standard or index that will determine "fair return" on resale. (See C3)

Field Office Action: If yes, proceed with your review. If no, you must contact the jurisdiction and ask that it revise its resale provision to include a definition of "fair return on investment." If this is not possible or the jurisdiction fails to respond or submit an acceptable revision within the 45-day review period, you must inform the jurisdiction in the Annual Action Plan approval letter that HUD is disapproving its resale provisions and it may not use any HTF funds to undertake any activities related to homebuyer assistance until the jurisdiction has submitted and HUD has approved the resale provisions to be used.

C3: Is fair return based upon an objective index or standard?

☐ Yes ☐ No Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: An objective standard or index is concrete and publicly accessible and can be easily measured at the time of original purchase and at resale. Examples include: a percentage of the change in median sales prices over the period of ownership, the percentage change in area median income over the period of ownership, and the percentage change in the Consumer Price Index over the period of ownership. In depressed or declining markets, a loss on investment can constitute a fair return. A standard that ties the return to the original homebuyer to the price that a specific homebuyer or a defined group of low-income homebuyers can pay *does not* constitute fair return and is not acceptable.

Field Office Action: If yes, proceed with your review. If no, you must contact the jurisdiction and ask that it revise its resale provisions to specify the standard or index that will be applied upon resale to provide a fair return to the homebuyer. If this is not possible or the jurisdiction fails to respond or submit an acceptable revision within the 45-day review period, you must inform the jurisdiction in the Annual Action Plan approval letter that HUD is

disapproving its resale provisions and it may not use any HTF funds to undertake any activities related to homebuyer assistance until the jurisdiction has submitted and HUD has approved the resale provisions to be used.

C4: Does the basis upon which fair return is calculated include the homebuyer's original investment in the property and the increase in market value attributable to homebuyer investments in or capital improvements to the property?

☐ Yes ☐ No Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: The provision must specifically state that the basis for calculating fair return is the original investment by the homebuyer and specific types of upgrades or additions that will add value to the property. (Generally, replacing worn or dated components such as appliances or carpet would not be considered an improvement that adds value). The provision must address the types of changes that it will or will not include in that basis.

Field Office Action: If yes, proceed with your review. If no, you must contact the jurisdiction and ask that it revise its resale provisions so that homebuyer investment includes both the homebuyer-provided down payment and homebuyer-financed improvements that would increase the value of the home. If this is not possible or the jurisdiction fails to respond or submit an acceptable revision within the 45-day review period, you must inform the jurisdiction in the Annual Action Plan approval letter that HUD is disapproving its resale provisions and it may not use any HTF funds to undertake any activities related to homebuyer assistance until the jurisdiction has submitted and HUD has approved the resale provisions to be used.

Certifications		
<p><i>Note: Scanned copies of signed certifications can be attached in the AD-25 screen, though grantees must submit one original signed copy of the SF-424 and all certifications to HUD.</i></p>		
<p>Are the general and specific certifications for each program funded complete and accurate, where applicable:</p> <p>(a) <i>General</i></p> <ul style="list-style-type: none"> a. Affirmatively furthering fair housing? (See 24 CFR 570.904) b. *Anti-displacement and relocation plan? c. Anti-lobbying? Authority of jurisdiction? Consistency with plan d. *Acquisition and relocation? e. Section 3? <p><i>Note: The acquisition/relocation and the anti-displacement and relocation certifications are combined on the grantee's General Certification. This is the current certification available on the web for grantees. Notwithstanding the fact that they are combined under a single certification, they are still separate regulations and the checklist will identify them as two separate items.</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>(b) <i>CDBG</i></p> <ul style="list-style-type: none"> a) Citizen participation? b) Community development plan c) Following a current consolidated plan? d) Use of funds? e) Excessive force? f) Compliance with anti-discrimination laws? g) Compliance with lead-based paint procedures h) Compliance with laws? <p><i>Note: The certification period for the CDBG program's overall benefit requirements must be consistent with the period certified in the prior certification</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>(c) <i>ESG</i></p> <ul style="list-style-type: none"> a) Not less than 10 years – rehab? b) Not less than 10 years – conversion?? c) Not less than 3 years d) Providing shelter or services to homeless persons during period of ESG assistance? e) Renovation will result in safe and sanitary buildings? f) Recipients will assist in obtaining permanent housing services? g) Match requirement? h) Confidentiality? i) Involvement of homeless individuals and families? j) Consistency with Con Plan? k) Discharge policy? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>(d) <i>HOME</i></p> <ul style="list-style-type: none"> a. TBRA is consistent w/Plan? b. Use for eligible activities? c. PJ will evaluate HOME assisted projects for appropriate financial assistance? 3- or 10-year operation 	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>(e) <i>HOPWA</i></p> <ul style="list-style-type: none"> 1) Meet urgent needs? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>

HUD APPROVAL – 24 CFR 91.500(b)

The regulations at 24 CFR 91.500(b) state that HUD may disapprove a plan or a portion of a plan for the three following reasons:

- a) If it is inconsistent with the purposes of the Cranston-Gonzalez National Affordable Housing Act (NAHA);
- b) If it is substantially incomplete; or
- c) If certifications applicable to the CDBG program are not satisfactory to the Secretary in accordance with 570.304 or 570.485(c).

Disapproval for Inconsistency with NAHA – A plan may be disapproved if it is inconsistent with NAHA. A reviewer recommending disapproval for inconsistency with NAHA should show how the plan is inconsistent with the following purposes:

- helping families, not owning a home, to save for the down payment for the purchase of a home;
- retaining, where feasible, as housing affordable to low income families, those dwelling units provided for such purpose with federal assistance;
- extending and strengthening partnerships among all levels of government and the private sector, including for- and non-profit organizations, in the production and operation of housing affordable to low-and moderate-income families;
- expanding and improving federal rental assistance to very low-income families; or
- increasing the supply of supportive housing, which combines structural features and services needed to enable persons with special needs to live with dignity and independence.

Comments: _____

Substantial Incompleteness – The following are examples of consolidated plans or action plans that may be substantially incomplete:

- A plan that was developed without the required citizen participation or the required consultation;
- A plan that fails to satisfy all the required elements of the consolidated plan (i.e. did not meet a regulatory requirement of Part 91);
- A plan for which a certification is rejected by HUD as inaccurate after HUD inspected evidence and provided due notice, and opportunity for comment; and
- A plan that does not include a description of the manner in which the unit of general local government or state will provide financial or other assistance to a public housing agency if the public housing agency is designated as “troubled” by HUD.

Comments: _____

Entitlement Action Plan Checklist

January 2018

The chart below can be used to track plan status changes made during the review process:

<u>Date</u>	<u>Plan Status Changed</u> <u>From</u>	<u>Plan Status Changed</u> <u>To</u>	<u>User That</u> <u>Made the</u> <u>Change</u>	<u>Comments</u>

Based on my review of the Plan against the regulations, I have determined the Plan is:

Approved ☐

Date plan approved: _____

Disapproved ☐

Date plan disapproved: _____

Note: Written notification of disapproval must be communicated to the applicant in accordance with 24 CFR 91.500(c). **If disapproved**, provide documentation including dates and times on incompleteness determination, and discussions with grantee and Headquarters:

SIGNED:

Reviewer: _____ Date: _____

Program Manager: _____ Date: _____

CPD Director: _____ Date: _____

Citation Requirement by eCon Planning Suite Screen

IDIS	IDIS Screen Name	State Citation	Entitlement Citation
ES-05	Executive Summary	91.300(c), 91.320(b)	91.200(c), 91.220(b)
PR-05	Lead & Responsible Agencies	91.300(b)	91.200 (b)
PR-10	Consultation	91.110, 91.300(b); 91.315(l)	91.100, 91.200(b), 91.215(l)
PR-15	Citizen Participation	91.115, 91.300(c)	91.105, 91.200(c)
NA-05	Overview	none	none
NA-10	Housing Needs Assessment	91.305 (a,b,c)	91.205 (a,b,c)
NA-15	Disproportionately Greater Need: Housing Problems	91.305 (b)(2)	91.205 (b)(2)
NA-20	Disproportionately Greater Need: Severe Housing Problems	91.305 (b)(2)	91.205 (b)(2)
NA-25	Disproportionately Greater Need: Housing Cost Burdens	91.305 (b)(2)	91.205 (b)(2)
NA-30	Disproportionately Greater Need: Discussion	91.305 (b)(2)	91.205 (b)(2)
NA-35	Public Housing	none	91.205 (b)(2)
NA-40	Homeless Needs Assessment	91.305(c)	91.205 (c)
NA-45	Non-Homeless Special Needs Assessment	91.305 (b,d)	91.205 (b,d)
NA-50	Non-Housing Community Development Needs	91.315(f)	91.215 (f)
MA-05	Overview	none	none
MA-10	Number of Housing Units	91.310(a)	91.210(a)&(b)(2)
MA-15	Cost of Housing	91.310(a)	91.210(a)
MA-20	Condition of Housing	91.310(a)	91.210(a)
MA-25	Public and Assisted Housing	none	91.210(b)
MA-30	Homeless Facilities	91.310(b)	91.210(c)
MA-35	Special Needs Facilities and Services	91.310(c)	91.210(d)
MA-40	Barriers to Affordable Housing	91.310(d)	91.210(e)
MA-45	Non-Housing Community Development Assets	91.315(f)	91.215 (f)
MA-50	Needs and Market Analysis Discussion	none	91.210(a)
SP-05	Overview	none	none
SP-10	Geographic Priorities	91.315(a)(1)	91.215(a)(1)
SP-25	Priority Needs	91.315(a)(2)	91.215(a)(2)
SP-30	Influence of Market Conditions	91.315(b)	91.215 (b)
SP-35	Anticipated Resources	91.315(a)(4), 91.320(c)(1,2)	91.215(a)(4), 91.220(c)(1,2)
SP-40	Institutional Delivery Structure	91.315(k)	91.215(k)
SP-45	Goals	91.315(a)(4)	91.215(a)(4)
SP-50	Public Housing Accessibility and Involvement	91.315(c)	91.215(c)
SP-55	Barriers to Affordable Housing	91.315 (h)	91.215(h)
SP-60	Homelessness Strategy	91.315 (d)	91.215(d)
SP-65	Lead Based Paint Hazards	91.315 (i)	91.215(i)
SP-70	Anti-Poverty Strategy	91.315 (j)	91.215(j)
SP-75	Colonias Strategy (States with Colonias)	NAHA Sec. 916	

IDIS	IDIS Screen Name	State Citation	Entitlement Citation
	Only		
SP-80	Monitoring	91.330	91.230
AP-15	Expected Resources	91.320(c)(1,2)	91.220(c)(1,2)
AP-20	Annual Goals and Objectives	91.320(c)(3)& (e)	91.220(c)(3)&(e)
AP-25	Allocation Priorities (States Only)	91.320(d)	
AP-30	Method of Distribution (States Only)	91.320(d) and (k)	
AP-35	Projects	none	91.220(d)
AP-40	Section 108 Loan Guarantee (States Only)	91.320(k)(1)(ii)	none
AP-45	Community Revitalization Strategies (States Only)	91.320(k)(1)(ii)	none
AP-48	Method of Distribution for Colonias (States with Colonias Only)	91.320(d)&(k)	
AP-50	Geographic Distribution	91.320(f)	91.220(f)
AP-55	Affordable Housing	91.320(g)	91.220(g)
AP-60	Public Housing	91.320(j)	91.220(h)
AP-65	Homeless and Other Special Needs Activities	91.320(h)	91.220(i)
AP-70	HOPWA Goals	91.320(k)(4)	91.220 (l)(3)
AP-75	Barriers to Affordable Housing	91.320(i)	91.220(j)
AP-80	Colonias Actions (States with Colonias Only)	HUD Notice CPD 11-001	
AP-85	Other Actions	91.320(j)	91.220(k)
AP-90	Program Specific Requirements	91.320(k)(1,2,3)	91.220(l)(1,2,4)

The City of Tucson updated the Human Services Plan in FY 2016. This Plan outlines priorities, goals and the process used to allocate resources for human services programs. These include Emergency Solutions Grant funding for homeless services, CDBG funding for crisis assistance and any allocation of general funds approved in the City of Tucson budget process will fund human services programs prioritized in the Human Services Plan. The full Human Services Plan is posted on the City's web site at: <http://cms3.tucsonaz.gov/hcd/whats-new>

In February of 2016, a committee of over 20 volunteers reviewed and rated 100 applications for Human Services Programs. Their recommendations were then reviewed by an oversight committee that recommended funding, in accordance with the revised Humans Services Plan, to the highest ranked proposals based on the service they intend to provide and the funding source they applied for. The recommended programs, funding source and funding amount are listed in the table below:

FY 2019 Human Services Program Funding Recommendations – City of Tucson			
Emergency Solutions Grant (ESG) Assistance to Homeless			
Applicant	Program	Consolidated Plan Category Outcomes	Funding
Interfaith Community Services	Homeless Prevention	Prevention – 18 people	\$50,000
TCWC dba EMERGE	Rapid Rehousing	Rapid Re-Housing – 20 households	\$50,000
SAAF	New Life	Rapid Re-Housing – 7 households	\$50,000
Compass Affordable Housing	Housing Solutions, Tucson	Rapid Re-Housing – 40 people	\$50,000
Our Family Services	Street Outreach	Outreach – 50 people	\$50,000
Primavera Foundation	Primavera Emergency Services	Outreach – 800 people	\$21,176
Our Family Services	Emergency Shelter Services	Emergency Shelter - .65 FTE for Shelter	\$50,000
TCWC dba EMERGE	ESG Shelter	Emergency Shelter - 11	\$50,000
Primavera Foundation	Greyhound Shelter	Emergency Shelter – 70 people	\$50,000
TOTAL PROJECTS		964 Homeless people; 67 households	\$421,176
Community Development Block Grant Funds (CDBG)			
Human Services – Crisis Assistance and Emergency Services			
Applicant	Program	Consolidated Plan Category Outcomes and Human Services Priorities	Funding
Emerge! Center Against Domestic Violence	Crisis Intervention – Children	Public/Human Services 227 Youth	\$62,034
Pima Council on Aging	Home Care Services for the Elderly	Public/Human Services 30 Seniors	\$50,000
Youth on Their Own	Special Needs Program	Public/Human Services 200 Youth	\$50,000
Old Pueblo Community Services	CDBG Low-Demand Shelter	Public/Human Services 50 Homeless	\$150,000
Emerge! Center Against Domestic Violence	Crisis Intervention – Adult	Public/Human Services 393 Special Populations	\$150,000
Southern Arizona Children's Advocacy	Investigation/Intervention Services for Abused Children	Public/Human Services 6500 Youth	\$76,511
Pima Council on Aging	Nutrition Program for the Elderly	Public/Human Services 68 Seniors	\$50,000
Emerge! Center Against Domestic Violence	Safe Hands: Shelter for Survivors of Human Trafficking	Public/Human Services 34 Special Populations	\$60,000
Our Family Services	Safe Hands: Shelter for Survivors of Human Trafficking	Public/Human Services 51 Special Populations	\$90,000
TOTAL PROJECTS:		7,553 people	\$738,545

General Funds – Human/Public Services based on \$1,306,538			
Applicant	Program	Consolidated Plan Category Outcomes and Human Services Priorities	Funding
Primavera Foundation	Primavera Works	Special Populations - 550	\$100,000
Southern Arizona Legal Aid Inc.	Home Owner and Tenant Protection Project	Special Populations - 450	\$99,713
Sub Total Special Populations		1,000 people	\$199,713
Applicant	Program	Consolidated Plan Category Outcomes	Funding
Interfaith Community Services Seniors and Disabled Adults	Case Management with Emergency Financial Services	Elderly/Disabled 1,200	\$50,000
Interfaith Community Services Seniors and Disabled Adults	Care Giving Health Advocacy Program	Elderly/Disabled 220	\$50,000
Pima Council on Aging (PCOA)	Family Care Giver Support Program	Elderly/Disabled 20	\$50,000
Pima Council on Aging (PCOA)	Home Repair and Adaptation and Maintenance for the Elderly	Elderly/Disabled 155	\$60,500
Mobile Meals Inc.	Mobile Meals of Tucson: Special Diet Meal Delivery in FY 2017	Elderly/Disabled 60	\$50,000
Tucson Urban League	Tucson Urban League Senior Meals Program	Elderly/Disabled 300	\$50,000
SUB-TOTAL ELDERLY/DISABLED:		1,955 people	\$310,500
Youth on Their Own	Stipend Program	Youth 540	\$75,560
Community Food Bank	Back Packs Program	Youth 2,000	\$50,000
Pima Prevention Partnership	Pima County Teen Court Program	Youth 800	\$50,000
Southern Arizona Association for the Visual Impaired	Educational Core Competency Program for Blind Children	Youth 150	\$50,262
Arizona Children's Association	Arizona Kinship Support Services	Youth 1800	\$50,000
Metropolitan Education Commission	Regional College Access Center	Youth 1,190	\$51,895
Girl Scouts of Southern Arizona	Girl Scouts Social Justice/Leadership Development Program	Youth 350	\$50,000
Parent Aid Child Abuse Prevention Center	Parent Partners: Home Parent Support	Youth 20	\$50,000
Tucson Urban League	TUL Project Yes Pre-school and School Age Program	Youth 85	\$50,000
SUB-TOTAL YOUTH:		6,935	\$477,717
IziAzi	Growing and Giving Felicia's Farm	Homeless 3,000	\$50,000
Old Pueblo Community Services	General Fund Outreach	Homeless 150	\$68,568
Our Family Services Inc. – Youth	Our Family HYS Case Management – GF	Homeless 25	\$50,000
Our Family Services Inc. – Youth	Our Family HYS Parent Education and Support -GF	Homeless 25	\$50,000
TMM Family Services Inc.	Families Reunite	Homeless 9	\$50,000
COMPASS Affordable Housing Inc.	Community Stabilization Tucson	Homeless 30	\$50,000
SUB-TOTAL HOMELESS:		3239	\$318,568
Community Food Bank, Inc.	Emergency Food Assistance	1,758 people	\$100,000
Community Home Repair Projects of AZ	Acute Emergency Home Repair	58 homes	\$58,412
SUB TOTAL ADD'L GENERAL FUNDS		1,758 people & 58 homes	\$158,412
TOTAL GENERAL FUND:		14,887 people & 58 homes	\$1,464,910

Appendix A

FY 2019 Human Services Program Funding

Appendix B 2015-2019 City of Tucson Five-year Consolidated Plan (link only)

https://www.tucsonaz.gov/files/hcd/Amended_Five_Year_Consolidated_Plan_2015_2019.pdf

Appendix C

City of Tucson Human Services Plan



Human Services Plan

FY 2017 – FY 2020

City of Tucson

Department of Housing and Community Development

**310 Commerce Park Loop
Tucson, Arizona 85745
(520) 791-4171**

www.tucsonaz.gov/housing-and-community-development



On April 5, 2016, this Human Services Plan was presented to Mayor and Council for review. At this meeting, Mayor and Council passed by a roll call vote of 7 to 0, to adopt Resolution No. 22550, with an amendment to the Human Services Plan that would retain the current funding for the first year of the Plan, and implement the new funding for the remainder of the Plan. This included postponing implementation of this plan until FY 2018.

Introduction

Definition of Human Services

Human Service programs are defined as targeted programs designed to meet a unique need that enhances the quality of life for program participants, who may otherwise not receive these services and benefits. Human services programs serve specific populations, including youth and families, the elderly, persons with disabilities, homeless individuals, and other vulnerable individuals in need. The City has generally targeted its discretionary funds to under-served or un-served populations that are not assured services or are not eligible for reduced-cost services

What is the purpose of funding Human Services programs?

Human Service programs are essential to the growth and vitality of a community. By investing in the prevention as well as the remediation of personal struggles, community members will have an opportunity to achieve well-being and lead self-sufficient, self-determined, and productive lives. Most human services are designed to help vulnerable residents achieve maximum independence to meet their own day-to-day and unique needs related to the following:

- ***Health/Safety***
- ***Food/Nutrition***
- ***Shelter/Housing***
- ***Sustainable Income/Support***
- ***Mobility/Transportation***
- ***Education/Access to Information***
-

Who are the vulnerable residents in need of Human Services?

- ***Alcohol/Other Drug Addicted Persons***
- ***Elderly and Frail Elderly***
- ***Ex-Offenders***
- ***Homeless Persons***
- ***Persons with Disabilities***
- ***Persons with HIV/AIDS & their families***
- ***Persons with Severe Mental Illness***
- ***Veterans***
- ***Victims of Domestic Violence***
- ***Youth***

What types of assistance are available through human services programs?

Categories of Human Services – City of Tucson Human Services Plan					
Human Services	Crisis Intervention	Emergency Assistance	Transitional Programs	Support Services	Prevention
Definition	One-time assistance to address a problem that is posing an immediate threat to the health, life, or safety of the person or household in crisis, and/or to the surrounding community.	One-time or intermittent assistance to address a problem caused by a financial, health, or circumstantial loss resulting from unexpected disaster, tragedy, crime, and/or environmental decay; or a steady decline in socio-economic conditions, such as chronic poverty.	Limited assistance or a combination of services that are designed to move a person or household from a crisis or emergency situation to some stability and ultimately, self-sufficiency within a specific time frame; typically 24 months but could be longer.	Ongoing services provided by an established network of service providers that help vulnerable populations maintain stability and maximize self-sufficiency.	Ongoing, intermittent or case-based assistance that protects the stability and self-sufficiency of a person or household, particularly after they receive emergency, transitional or support services.
Institutional Structure	<ul style="list-style-type: none"> Public Safety Personnel Hospitals Mental Health Networks Child Protective Services Domestic Violence Agencies Courts 	<ul style="list-style-type: none"> Continuum of Care Non-profit Agencies Faith or community-based organizations Charitable, pro-bono, event-based or advocacy organizations 	<ul style="list-style-type: none"> Non-profit Agencies Group Homes Congregate Care 	<ul style="list-style-type: none"> Local Government/PHA Non-profit Agencies Clinics Neighborhood Centers Schools Charitable, pro-bono, event-based or advocacy organizations 	<ul style="list-style-type: none"> Non-profit Agencies Clinics Neighborhood Centers Schools Employers Businesses Neighborhood Associations
Service Intervals and Duration	One time and follow up with referral to services	One-time or intermittent; shelter stays up to 60 days	Up to 24 months or more with HUD approval; requires case plan	Ongoing based on eligibility or a case management plan	Ongoing, intermittent or case based support that includes education
Goal and Desired Outcome	Interrupt crisis and stabilize individual; make referrals.	Prevent individual from experiencing further loss or falling into crisis.	Create stability, self-sufficiency and prepare for independence.	Maintain stability and self-sufficiency or independence based on unique needs.	Reduce probability of crisis or emergencies.
Priority Populations	Homeless Youth Elderly and Frail Elderly Persons with Disabilities Persons with Severe Mental Illness Persons with Severe Mental Illness Alcohol/Other Drug Addicted Persons with HIV/AIDS & their families Public Housing Residents Ex-Offenders Poverty-level households	Homeless Youth Elderly and Frail Elderly Persons with Disabilities Persons with Severe Mental Illness Alcohol/Other Drug Addicted Persons with HIV/AIDS & their families Public Housing Residents Ex-Offenders Poverty-level households	Homeless Youth Elderly and Frail Elderly Persons with Disabilities Persons with Severe Mental Illness Alcohol/Other Drug Addicted Persons with HIV/AIDS & their families Public Housing Residents Ex-Offenders Poverty-level households	Homeless Youth Elderly and Frail Elderly Persons with Disabilities Persons with Severe Mental Illness Alcohol/Other Drug Addicted Persons with HIV/AIDS & their families Public Housing Residents Ex-Offenders Poverty-level households	Homeless Youth Elderly and Frail Elderly Persons with Disabilities Persons with Severe Mental Illness Alcohol/Other Drug Addicted Persons with HIV/AIDS & their families Public Housing Residents Ex-Offenders Poverty-level households

City of Tucson Human Services Plan

The City of Tucson Mayor and Council have articulated priorities for the use of funding that supports human services in the community. These priorities are children, families and seniors. In coordination with the Consolidated Plan, a Human Services Plan is developed which outlines and then prioritizes the Human Services needs of our community. Programs are then funded that provide services that address these needs.

The purpose of the Human Services planning process is to:

- ***With community input, create a unified plan for identifying needs and resources for addressing those needs.***
- ***Consolidate funding to a broad range of human service related non-profits into a single process.***
- ***Provide consistency of funding through a two-year allocation process***
- ***Encourage equity through a competitive Request for Proposal (RFP) process using community volunteers on the review committees.***
- ***Promote accountability by requiring outcome measures and outputs with ongoing contract monitoring by the HCD staff.***

This document outlines the broad distribution recommendations of approximately \$2.5 million during each fiscal year to fund programs which will be awarded in a competitive RFP process.

These following recommendations are a result of input from the Human Services Planning Committee and the Oversight Committee. The Human Services Planning Committee is comprised of Mayor and Council Aides, staff from multiple COT departments, HCD Staff, and citizens. The Oversight Committee is comprised of the Director and Deputy Director of HCD and the Deputy Chief of Tucson Fire.



Five Year History

The following table lists Human Services funding based on HUD entitlement grants and general funds for the past five years plus proposed allocations for FY 2017:

HUD Program year Allocation to the City of Tucson	Community Development Block Grant Program (CDBG) 15% set-aside	Emergency Solutions Grant Program (ESG)	Housing Opportunities for People with AIDS (HOPWA)	City of Tucson General Funds for Human Services	TOTAL Funding for Human Services Programs
PY 2011	\$839,611	\$377,894	\$453,761	\$1,464,910	\$3,136,176
PY 2012	\$765,672	\$484,731	\$459,084	\$1,464,910	\$3,174,397
PY 2013	\$784,712	\$372,387	\$433,227	\$1,485,910	\$3,076,236
PY 2014	\$767,080	\$424,994	\$453,077	\$1,464,910	\$3,110,061
PY 2015	\$767,714	\$455,833	\$451,530	\$1,464,910	\$3,139,987
PY 2016	\$754,688	\$460,731	\$456,639	\$1,318,419*	\$2,990,477

*10% less than the amount allocated for prior year FY 2016. This amount will require Mayor and Council approval

The following table is a five year history of the number of persons served using the allocated funding:

City of Tucson Consolidated Plan Goal/Activity	FY 2011 # assisted	FY 2012 # assisted	FY 2013 # assisted	FY 2014 # assisted	FY 2015 # assisted	5-year completions	CDBG National Objective
Assistance to Homeless Persons	10,251	9,440	7,348	3,603	4,975	35,617	<ul style="list-style-type: none"> Assist Low Income persons Suitable Living Environment
Assistance to the Elderly or Persons with Special Needs	6,351	6,549	8,070	1,461	1,014	23,445	<ul style="list-style-type: none"> Assist Low Income persons Suitable Living Environment
Public and Human Services programs	37,072	38,930	33,631	27,851	11,238	148,722	<ul style="list-style-type: none"> Assist Low Income persons Suitable Living Environment

The City of Tucson is also awarded Continuum of Care Grants from HUD. These funds are restricted to programs that assist the homeless and are administered through Tucson Pima Collaboration to End Homelessness (TPCH). Approximately \$8 million is allocated annually.

The Planning Process

In October 2015, HCD held a community conversation session with the objective of developing the City of Tucson's Human Services Goals & Priorities for FY 2017 through FY 2020. Representatives from City of Tucson Departments including TPD, TFD, Economic Development, PDSD, and Parks along with staff from the Mayor and Council offices were invited. We also invited representatives of non-profit agencies including United Way, Cenpatico, DIRECT Center for Independence, Pima Council on Aging, SAAF, Tucson Urban League, TPCH, Pima County, Pima County Library, Our Family and Veterans Administration. During this session, the committee produced a list of needs within our community which included:

Youth programs including quality childcare, safe, affordable after school programs and child assistance for the working poor, and lunch programs.

Homeless programs including intensive & sustained case management/wrap around services, support for low demand shelters, ensure that shelters are accessible to people with all types of disabilities, provide drop-in programs for homeless youth (safe places, open late) and provide homeless prevention services especially for families with children.

Financial programs that assist families with free tax preparation

Housing programs to allow for safe, healthy, affordable housing for families with children.

Elderly/Disabled programs to support aging-in-place by home repairs and education (fall prevention), provide affordable, accessible integrated housing, provide senior lunch and socialization opportunities, provide in-home supports and services for independent living.

Transportation services to support public transportation for better access to non-emergency facilities

Mental health programs to provide case management support, services, and housing.

In November 2015, a smaller committee comprised of Mayor/Council Aides, HCD staff, representatives from TPD, TFD, Economic Initiatives, PDSD and Pima County were invited to two meetings to review the outcome of the original community conversation with the direction to create a list of priorities.

Below is this list:

Youth - Examples include but are not limited to:

- Assistance for quality childcare
- Case management, transportation, nutrition, education, life skills
- Provide safe and affordable after school programs for children & youth

Elderly and/or Disabled - Examples include but are not limited to:

- Provide intensive & sustained case management/wrap around services for elderly/disabled
- Nutrition Assistance
- Case management, transportation, life skills

Homeless - Examples include but are not limited to:

- Case management, nutrition, education, life skills
- Financial training

- Support low demand shelters
- Provide shelters that are accessible to people with all types of disabilities
- Provide drop-in programs for homeless youth (safe places, open late)
- Provide homeless prevention services

Special Populations - Examples include but are not limited to:

- Veterans
- Refugee
- Single parent
- Limited English Proficiency clients

Crisis Assistance - (CDBG eligible) - Examples include but are not limited to:

- Intervention and Prevention
 - Domestic Violence
 - Child Abuse
 - Sexual Assault
- Emergency Assistance
- Emergency Shelter

In December 2015, we conducted an online survey asking participants to prioritize the needs as determined at the earlier meetings. A request to participate in the survey was sent, via email, to over 600 addresses including registered neighborhood association members and to known agencies and government staff. We received 124 responses where the majority of these responses came from neighborhood members. Below is a summary of the questions in the survey with the top four responses.

Funding Priorities - Based on your knowledge of human services programs in the community, please rate the vulnerable populations on this list.

1. Persons with severe mental illness
2. Elderly and Frail Elderly
3. Homeless Person
4. Youth

The City's role in Human Services - Please rank the following in terms of the City's role in the delivery of Human Services.

1. Emergency Services
2. Crisis Intervention
3. Prevention
4. Supportive Services

Please rank the following possible services provided for Youth programs.

1. Breakfast/lunch programs year round
2. Child Care assistance
3. After School Programs
4. Drop in programs for homeless youth

Please rank the following possible services provided for Homeless individuals or families.

1. Emergency Shelters
2. Case Management – one-on-one support to assist in success of long term housing
3. Accessible shelter for homeless with a disability
4. Prevention

Please rank the following possible services provided to Elderly/Disabled persons.

1. Aging in home support
2. Food assistance – meals, nutrition assistance
3. Transportation
4. Caregiver Support

Please rank the following services provided for crisis assistance.

1. Child abuse intervention
2. Child abuse prevention
3. Domestic abuse intervention
4. Elderly abuse intervention

Please rank the following special populations to be served by human services programs.

1. Single Parents
2. Refugees
3. Veterans
4. Ex-Offenders

Improving the Human Services Network - Based on your knowledge of human services in the community which changes would improve the delivery of Human Services in Tucson (pick three)

1. There needs to be an increase in collaboration among agencies.
2. There needs to be more strategic investment based on research (evidence) and desired outcomes.
3. The agency referral system and case management services need to be coordinated to eliminate duplication of effort.
4. Services need to be more accessible to clients

In March 2016, we reconvened the Human Services Committee and asked them to review their past efforts from November and the citizen survey results from December. We then asked them to prioritize the four categories created in November and then assign to each one a percentage of funding. We explained that the allocation of funds will be for General Funds as direction of other funding had been determined. This included:

- *CDBG funds to be allocated to Crisis Assistance*
- *ESG funds to be allocated to Homeless programs as directed by the grant*
- *HOPWA funds to be allocated to Housing and Supportive Services for Persons with AIDS/HIV*

The results from this committee for the allocation of General Funds are:

Category	General Funds allocation
Youth including assistance for quality child care, case management, transportation, nutrition, education, life skill, after school programs	36%
Elderly and/or Disabled including aging in place, nutrition assistance, transportation, case management	24%
Homeless including case management, support low demand shelters, provide shelters that are accessible to disabled, drop in programs for homeless youth, prevention	24%
Special Populations including veteran, refugee, single parents, Limited English Proficiency clients	16%

These recommendations are then reviewed by the Oversight Committee who will then make the final recommendations on which agencies will be funded. The Oversight committee is comprised of:

- *Director, City of Tucson Housing & Community Development*
- *Deputy Director, City of Tucson Housing & Community Development*
- *Deputy Chief, Tucson Fire Department*

HUMAN SERVICES PLAN

Annually, the Human Services Plan will engage in the following process:

Request for Proposal (RFP) Process

As part of the Human Services process, HCD will advertise a Request for Proposal for Human Services Programs which is directed to non-profit agencies, faith based organizations or government entities. We now use a software program, ZoomGrants, which is web-based and designed specifically for government agencies that are responsible for dispersing federal, state and local funds through an RFP process. Agencies are asked to provide a proposal that would provide assistance to the list of categories that was determined by the Planning Committee. Within their proposals, there are directed to provide the following:

- ✓ *Verification of 3 years experience and successful past performance of their program*
- ✓ *Demonstrated a need for Continuum of Services in the Community*
- ✓ *Provide a detailed outline of their program*
- ✓ *\$50,000 contract minimum, \$150,000 maximum*
- ✓ *Funding should be proportionate to the services being delivered*
- ✓ *Demonstrate any matching services/funds to demonstrate maximize benefit*
- ✓ *Consistent with Request for Proposals (RFP) rating and ranking criteria*
- ✓ *Identify which funding source they were applying for*

Review of applications by Citizen Committee

We will then ask citizens to help review and score the proposals in accordance with our evaluation criteria, our funding source requirements, our Human Services plan and our five year Consolidated Plan. Approximately 25 citizens are invited to participate. These participants may include Mayor and Ward office staff, City staff, Pima County Staff, persons with expertise in Human Services programs and citizens. To avoid a conflict of interest, no person associated or employed with an agency that applies for funding is invited to participate in this review.

ESG grant applications are reviewed by a committee that includes members of Tucson Pima Collaboration to End Homelessness (TPCH).

Funding Allocation recommendations

The Oversight Committee responsibilities include:

- **Recommend the top rated CDBG Crisis Assistance proposals determined by the citizen committee.**
- **Recommend the top rated ESG proposals as determined by the citizen committee which include members of Tucson Pima Collaboration to End Homelessness (TPCH) along with member of the community. The Continuum of Service Committee of TPCH will then review the suggested percentages of funding as determined by the grant and the citizen committee.**
- **Recommend the top rated proposals determined by the citizen committee and categorized by the four priorities along with funding percentages as indicated below:**

Category	General Funds allocation
Youth including assistance for quality child care, case management, transportation, nutrition, education, life skill, after school programs	36%
Elderly and/or Disabled including aging in place, nutrition assistance, transportation, case management	24%
Homeless including case management, support low demand shelters, provide shelters that are accessible to disabled, drop in programs for homeless youth, prevention	24%
Special Populations including veteran, refugee, single parents, Limited English Proficiency clients	16%

These recommendations will then be made public for a thirty day comment period along with a public meeting and a public hearing where comments from the public are accepted.

The final recommendations along with a list of any public comments will be presented to Mayor and Council for approval as part of the Annual Action Plan. They will give final approval for agencies funded by General Funds.

The results of the Mayor and Council recommendations along with any public comments will then be submitted to the U.S. Housing and Urban Development (HUD) for final approval for agencies funded by CDBG, ESG and HOPWA.

Appendix A – Governing Regulations.

*Community Development Block Grant Program- 24 CFR Part 570*Code of Federal Regulations (CFR)*

CDBG eligible activities include housing, public services, public facilities, neighborhood improvements, economic development and program administration. Over a 1, 2, or 3-year period, as selected by the grantee, not less than 70 percent of CDBG funds must be used for activities that benefit low- and moderate-income persons. In addition, each activity must meet one of the following national objectives for the program: benefit low- and moderate-income persons, prevention or elimination of slums or blight, or address community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community for which other funding is not available. ~hud.gov~

Emergency Solutions Grant - 24 CFR Part 576 Code of Federal Regulations (CFR)*

The ESG program provides funding to:

- 1. Engage homeless individuals and families living on the street;*
- 2. Improve the number and quality of emergency shelters for homeless individuals and families;*
- 3. Help operate these shelters;*
- 4. Provide essential services to shelter residents;*
- 5. Rapidly re-house homeless individuals and families; and*
- 6. Prevent families and individuals from becoming homeless.*

ESG funds may be used for five program components: street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and HMIS; as well as administrative activities (up to 7.5% of a recipient's allocation can be used for administrative activities). ~hud.gov~

APPENDIX B – Community Needs and Goals/Plan Tucson Goals and Policies Linked to the City of Tucson Consolidated Plan

5-year Consolidated Plan required by the U.S. Department of Housing and Urban Development (HUD)
The City of Tucson is required to develop a 5-year Consolidated Plan to receive annual allocations of Federal entitlement grants from the U.S. Department of Housing and Urban Development (HUD). The Consolidated Plan is designed to help the City assess affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions. This Consolidated Planning requirement was enacted by the Cranston-Gonzalez National Affordable Housing Act of 1990 and combines the planning and federal application processes for HUD entitlement grants received by the City of Tucson.

2015 – 2020 City of Tucson Consolidated Plan Priorities, Goals and Objectives

In general, HUD resources must be used to benefit low and moderate income (low-mod) households and neighborhoods. A housing market analysis and assessment of other community needs are conducted for the Consolidated Plan. The housing market analysis and needs assessment identify trends and conditions in a socio-economic context. A summary of key trends and conditions follows the summary of priorities, goals and objectives.

The Pima County Community Development and Neighborhood Conservation Department (CDNC) and the City of Tucson Department of Housing and Community Development (HCD) jointly sponsored 14 forums on various Consolidated Plan topics. In addition to the forums, City of Tucson HCD staff met with eight neighborhood associations. One hundred and ten residents participated in the neighborhood association meetings; 70 residents completed surveys regarding priorities. Trends and conditions were reviewed in the context of stakeholder and citizen input to establish priorities, goals and objectives for the next five years.

In many cases, federal, state and local resources leverage HUD funding. To address infrastructure, facility, housing and services needs using HUD funding, HCD established goals and objectives to address needs in six categories:

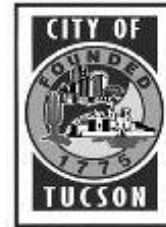
- 1. Affordable Rental Housing;**
- 2. Affordable Owner Housing;**
- 3. Homelessness;**
- 4. Human Services and Economic Opportunities;**
- 5. Neighborhood Revitalization, Public Facilities and Infrastructure; and**
- 6. Special Needs Populations.**

In FY 2014, the Consolidated and Annual Plan became linked to the City's updated 10-year General Plan Goals and Policies, "Plan Tucson". Plan Tucson, the new City of Tucson General and Sustainability Plan, was ratified by voters at the November 5, 2013 General Election and the results declared on November 13, 2013, Resolution #22160. The table below correlates the 2015 – 2020 Consolidated Plan Goals with Plan Tucson Goals and Policies. Human Services program goals are highlighted:

2015 -2020 Consolidated Plan Goal Categories	Priority	5-year Goals	Funding Sources	Plan Tucson Goals and Policies Addressed
Rental Housing Rehabilitation	High	300 units	HOME	HP2, H1, H2, H3, H4, H5, H6, H7, H8, H9, H10, PS4, RR1, RR2, RR4, RR5, RR6
Rental Housing New Construction	High	400 units	HOME	BC8, BC9, EC2, H1, H2, H3, H4, H5, H6, H7, H8, H9, H10, H11, HP7, HP8, LT3, LT9, LT10, RR1, RR2
Rental Housing Preservation of Expiring Units	High	75 units	HOME	H1, H2, H6, H7, H8, H10
Owner Occupied Housing Rehabilitation	High	1,800 units	CDBG, HOME	HP2, H1, H2, H3, H4, H6, H8, H9, PS4, RR1, RR2, RR4, RR5, RR6
Home Purchase Assistance	Low	110 households	CDBG, HOME	BC9, H1, H2, H6, H7, H11, RR1, RR2
Home Buyer New Construction	Low	50 units	CDBG, HOME	BC8, BC9, EC2, H1, H2, H6, H7, H11, HP7, HP8, LT3, LT9, LT10, RR1, RR2
Assistance to Homeless Emergency Shelter	High	11,500 people	CDBG, ESG	H1, H2, H3, H8, H10
Assistance to Homeless Maintain and Add Beds, Transitional Units and Permanent Housing	High	925 Units	CDBG, ESG	H1, H2, H6, H7, H8, H10
Assistance to Homeless Rapid Rehousing/TBRA	High	700 households	HOME, HOPWA, ESG	H1, H2, H6, H7, H8, H10
Assistance to Homeless Prevention	High	4,000 people	HOME, HOPWA, ESG	H1, H2, H6, H7, H8, H10
Assistance to Homeless Outreach, Support Services & Case Management	High	6,000 people	CDBG, ESG	H1, H2, H6, H7, H8, H10
Assistance to Homeless Emergency & Transitional Housing Improvements	High	400 people	CDBG	H1, H2, H6, H7, H8, H10
Human/Public Services, including education & employment supports	High	75,000 people	CDBG, HOPWA	AG3, E1, E2, E4, EQ2, H10, JW5, JW7, PH2 – PH6, PS8
Job Creation	High	500 jobs	CDBG, Section 108	AG3, E1, E2, E4, EQ2, H10, JW5, JW7, PH2 – PH6, PS8
Public Facilities and Infrastructure	High	75,000 people	CDBG, CDBG Section 108	EC1, EC6, HP3, HP5, PH1, P11, P13, PR2-PR9, PS10, RR1, RR2, RR3, RR6, TQ3, WR1-WR9
Demolition of unsafe/vacant structures	High	35 structures	CDBG	RR5
Tenant-based Rental Assistance	High	60 households	HOPWA	H1, H2, H6, H7, H8, H10

Appendix D

Policy Manual for Emergency Solutions Grant (ESG) Program



POLICY MANUAL
EMERGENCY SOLUTIONS GRANTS (ESG) PROGRAM

Table of Contents

I. INTRODUCTION

- A. Description of Emergency Solutions Grants (ESG) Program
- B. ESG Program Awards to City of Tucson and Pima County
- C. Community Input for Program Development
- D. Process for Sub-Awards
- E. Location of Policy Manual
- F. Revisions and Updates

II. ESG Program Overview

- A. Eligible Program Components
- B. Homeless Definition
- C. Eligibility by Component: Homeless
- D. Categories of At Risk of Homelessness
- E. Program Governance
- F. Reallocation and recapture
- G. Program Position Descriptions
- H. Marketing, Outreach, and Client Access
- I. Coordination Among Providers
- J. HMIS: ESG Program Data Collection
- K. Property Verification and Inspections
- L. Grievance Policy
- M. Fraud Prevention and Response
- N. Confidentiality
- O. Conflicts of Interest
- P. Nondiscrimination & Equal Opportunity Requirements
- Q. Affirmatively Furthering Fair Housing

III. ESG Program Component Policies

- A. Street Outreach
- B. Emergency Shelter
- C. Homelessness Prevention
- D. Rapid Re-Housing
- E. Ineligible Services
- F. Termination of Assistance

IV. ESG Program Administration

VI. Performance Standards

V. Summary of ESG Program Performance Standards

I. INTRODUCTION

BACKGROUND AND PROGRAM DESCRIPTION

A. Description of Emergency Solutions Grants (ESG) Program

On May 20, 2009, President Obama signed the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009. Beginning FY 2011 the U.S. Government has allocated \$250 million in funds to eligible recipients to (1) engage homeless individuals and families living on the street; (2) improve the number and quality of emergency shelters for homeless individuals and families; (3) help operate these shelters (4) provide essential services to shelter residents, (5) rapidly re-house homeless individuals and families, and (6) prevent families and individuals from becoming homeless. Pima County and the City of Tucson may provide ESG funds to projects operated by units of general purpose local government or private nonprofit organizations. The Continuum of Care within these jurisdictions must be consulted when determining how to allocate the ESG funds.

All funded agencies are required to follow federal guidelines in the implementation of ESG funding. The City of Tucson and Pima County have written the following policies and procedures to facilitate the agencies in implementing the ESG guidelines as set by the U.S. Department of Housing and Urban Development. Agencies will provide assistance related to housing of persons at risk of becoming homeless and housing persons that are currently homeless, as well as provide housing relocation and stabilization services.

B. ESG Program Awards to City of Tucson and Pima County

The City of Tucson's Department of Housing and Community Development and Pima County's Department of Community Development and Neighborhood Conservation have both received an ESG formula grant. The City of Tucson and Pima County have decided to collaborate in the development of the policies and procedures regarding the disbursement of funds and data collection to promote consistent standards and avoid duplicate and unnecessary assistance. There are differences between the jurisdictional requirements and procedures due to jurisdictional target area differences. Pima County is focused on unincorporated areas whereas the City of Tucson is focused on the population within city limits.

C. Community Input for Program Development

The participation of homeless or formerly homeless individuals will assist in the allocation process and provide input to the evaluation of performance measures where at all possible.

D. Process for Sub-Awards

Funds will be awarded by the ESG Grantees on a competitive basis. The Request for Proposal Notice is released through the Continuum of Care as well as through the City Participation Process. The City of Tucson and Pima County jointly make the funding allocations. Members of the allocation committee are selected for their knowledge of services and participation in the Continuum. Every effort is made to involve a homeless or formerly homeless person in the process. The committee ranks the proposals individually and then reviews them as a committee and makes the final funding recommendations.

A HUD Technical Assistance provider is assisting the Continuum to determine a process where performance standards will be set, as well as a process to evaluate outcomes.

E. Location of Policy Manual

The Policy Manual will be available as electronic documents located on both the Pima County and the City of Tucson website. A hard copy will also be available for review at the City of Tucson's Department of Housing and Community Development and Pima County's Department of Community Development and Neighborhood Conservation.

F. Revisions and Updates

The Policy Manual is a living document. As policies or procedures are modified, these revisions will be updated in the Policy Manual. The most recent version of Policy Manual will be posted online and able for viewing at the respective locations mentioned above.

II. ESG Program General Overview

The ESG program funds are intended to target two populations of persons facing housing instability: (1) individuals and families who are experiencing homelessness (residing in emergency or transitional shelters or on the street) and need temporary assistance in order to obtain housing and retain it, and (2) individuals and families who are currently in housing but are at risk of becoming homeless and need temporary rent and utility assistance to prevent them from becoming homeless or assistance to move to another unit.

A. ELIGIBLE PROGRAM COMPONENTS

- a. Street outreach: Essential services related to reaching out to unsheltered homeless individuals and families, connecting them with emergency shelter, housing or critical services, and providing them with urgent, non-facility-based care. Eligible costs include engagement, case management, emergency health and mental health services, and transportation. Street outreach includes services that are unable to be provided to individuals or families due to their unwillingness to come to a shelter.
- b. Emergency Shelter: Essential services such as case management, childcare, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, transportation, and services for special populations.

Shelter operations include maintenance, rent, repair, security, fuel, equipment, insurance, utilities, relocation, and furnishings. Where no appropriate emergency shelter is available for a homeless family or individual, eligible costs may also include a hotel or motel voucher for that family or individual.

- c. Homelessness Prevention: Housing relocation and stabilization services and short-and/or medium-term rental assistance as necessary to prevent the individual or family from becoming homeless if:

- i. Annual income of the individual or family is below 30 percent of median family income
- ii. Assistance is necessary to help program participants regain stability in their current permanent housing or move into other permanent housing and achieve stability in that housing.

Eligible costs include utilities, rental application fees, security deposits, last month's rent, utility deposits and payments, moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, and credit repair.

- d. Rapid Re-Housing: Housing relocation and stabilization services and short and/ or medium-term rental assistance as necessary to help individuals or families living in shelters or in places not meant for human habitation move as quickly as possible into permanent housing and achieve stability in that housing. Eligible costs also include utilities, rent application fees, security deposits, last month's rent, utility deposits and payments, moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, and credit repair.
- e. Data Collection (HMIS): Grant funds may be used for the costs of participating in an existing HMIS of the Continuum of Care where the project is located. Eligible costs include computer hardware, software, and software licenses. Also, office space, utilities, equipment and obtaining technical support may be paid for. Salaries for operation of HMIS may also be paid.
- f. Emergency Solutions Grant Administration: Up to 7.5 percent of a recipient's allocation can be used for general management, oversight, coordination, and reporting on the program.

B. HOMELESS DEFINITION

- a. Category 1: Literally Homeless
 - i. Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - 1. Has a primary nighttime residence that is a public or private place not meant for human habitation;
 - 2. Is living in a publicly or privately operated shelter designed to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or
 - 3. Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.
- b. Category 2: Imminent Risk of Homelessness
 - i. Individual or family who will imminently lose their primary nighttime residence, provided that:

1. Residence will be lost within 14 days of the date of application for homeless assistance
2. No subsequent residence has been identified; and
3. the individual or family lacks the resources or support networks needed to obtain other permanent housing
- c. Category 3: Homeless under other Federal Statutes
 - i. Unaccompanied youth under 25 years of age, or families with children or youth, who do not otherwise qualify as homeless under this definition, but who:
 1. Are defined as homeless under the other listed federal statutes;
 2. Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application
 3. Have experienced persistent instability as measured by two moves or more during the preceding 60 days; and
 4. Can be expected to continue in such status for an extended period of time due to special needs or barriers
- d. Category 4: Fleeing/ Attempting to Flee DV
 - i. Any individual or family who:
 1. Is fleeing, or is attempting to flee, domestic violence;
 2. Has no other residence; and
 3. Lacks the resources or support networks to obtain other permanent housing.

C. ELIGIBILITY BY COMPONENT: HOMELESS

- a. Street Outreach: Individuals defined as homeless under the following categories are eligible for assistance in Street Outreach:
 - i. Category 1 = Literally Homeless
 - ii. Category 4 = Fleeing/ Attempting to Flee DV (where the individual or family also meets the criteria for Category 1)
 1. Additional limitation on eligibility: Individuals and families must be living on the streets (or other places not meant for human habitation) and be unwilling or unable to access services in emergency shelter.
- b. Emergency Shelter: Individuals and families defined as Homeless under the following categories are eligible for assistance in Emergency Shelter projects:
 - i. Category 1 = Literally Homeless
 - ii. Category 2 = Imminent Risk of Homeless
 - iii. Category 3 = Homeless Under Other Federal Statutes
 - iv. Category 4 = Fleeing/ Attempting to Flee DV
- c. Rapid Re-housing: Individuals defined as Homeless under the following categories are eligible for assistance in Rapid Re-Housing projects:
 - i. Category 1 = Literally Homeless
 - ii. Category 4 = Fleeing/ Attempting to Flee DV (where the individual or family also meets the criteria for Category 1)
- d. Homelessness Prevention: Individuals and Families defined as Homeless under the following categories are eligible for assistance in Homeless Prevention projects:
 - i. Category 2 = Imminent risk of Homeless

- ii. Category 3 = Homeless Under Other Federal Statutes
- iii. Category 4 = Fleeing/ Attempting to Flee DV
 - 1. Individuals and Families who are defined as Homeless under the following categories are eligible for assistance in Homelessness Prevention projects
 - 2. Homelessness Prevention projects have the following additional limitations on eligibility with homeless and at risk of homeless:
 - a. Must only serve individuals and families that have an annual income below 30% of AMI.

D. CATEGORIES OF AT RISK OF HOMELESSNESS

- a. Category 1: Individuals and Families
 - i. Has an annual income below 30% of median family income for the area; AND
 - ii. Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the "homeless" definition; AND
 - iii. Meets one of the following conditions:
 - 1. Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; OR
 - 2. Is living in the home of another because of economic hardship; OR
 - 3. Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; OR
 - 4. Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; OR
 - 5. Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half person per room; OR
 - 6. Is exiting a publicly funded institution or system of care; OR
 - 7. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved Con Plan
- b. Category 2: Unaccompanied Children and Youth
 - i. A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute.
- c. Category 3: Families with Children and Youth
 - i. An unaccompanied youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) or that child or youth if living with him or her.

E. PROGRAM GOVERNANCE

City of Tucson and Pima County work with the HUD Regional Office and the Continuum of Care- represented by the Tucson Pima Collaboration to End Homelessness (TPCH), to ensure successful implementation and performance. The TPCH Emergency Solutions committee will review policies, procedures and performance measures.

F. FUNDS REALLOCATION AND RECAPTURE

Quarterly, the City and County ESG Program Coordinators will:

- Review financial reports and budget allocations for the eligible program components, and will re-allocate resources if necessary;
- Review service data on subpopulations to ensure that the program is serving groups such as military veterans or people with disabilities which is part of the Consolidated Annual Performance Evaluation Report (CAPER). Annually, this information will be provided to the Emergency Solutions committee.

G. PROGRAM POSITION DESCRIPTIONS

The following is a summary of each Emergency Solutions Grant Program position related to grant administration and program delivery. Further details about specific program procedures are found in Part III.

1. City of Tucson Project Coordinator

This position is responsible for administering the ESG grant that was awarded to the City of Tucson. In collaboration with the Pima County Project Coordinator, guides the program by acting as liaison with the Continuum of Care and other contractors, and also monitors agency subcontracts, ensures coordination with other mainstream services and prepares quarterly and annual performance reports to HUD.

2. Pima County Program Coordinator

This position is responsible for administering the ESG grant that was awarded to Pima County. In collaboration with the City of Tucson Project Coordinator, guides the program by meeting regularly with the Emergency Solutions committee and other contractors, and also monitors agency subcontracts, ensures coordination with other mainstream services and prepares quarterly and annual performance reports to HUD.

H. MARKETING, OUTREACH, AND CLIENT ACCESS

1. Outreach Activities

The ESG Program staff will conduct informational presentations about the ESG Program, and will provide regular reports to Tucson Pima Collaboration to end Homelessness (TPCH), which

is the local HUD Continuum of Care. Sub-recipients conduct outreach to support ESG component goals and activities to persons who are homeless or near homeless so that they are aware of the program and its services.

I. COORDINATION AMONG PROVIDERS

Assistance is targeted to housing stabilization, linking program participants to mainstream resources and assisting them to develop a plan to increase future housing stability. Sub-recipients provide eligible services and activities which may include: case management, counseling, developing, securing and coordinating services, linkage with mainstream resources, monitoring and evaluation of program participant progress. Sub-recipients also assure that program participants' rights are protected, and develop individualized housing and service plans, including a path to permanent housing stability once ESG program assistance is no longer available.

Each sub-recipient is required to read and follow ESG guidelines as set forth by HUD. The procedures contained herein serve to simplify the implementation of the regulations and identify allowable activities.

Sub-recipients will serve the population and provide the financial assistance and stabilization services as identified in the budget and scope of work as found in each of their contracts. Preliminary steps to be taken in implementing the ESG activities are as follows:

All sub-recipients receiving ESG assistance are required to participate in the local Homeless Management Information System (HMIS) or a comparable database and execute all Homeless Management Information System required documents as needed. These sub-recipients are also required to actively participate in the Tucson Pima Collaboration to End Homelessness (TPCH). TPCH is the local Continuum of Care and has over 50 member agencies including the local Veteran Administration, Open Inn, Gospel Rescue Mission, and the Primavera Foundation. TPCH continues to encourage mainstream providers such as the Social Security Administration and the Arizona Department of Economic Security to actively participate. It is suggested that agencies participate in the committees that directly relate to their clients to assist in coordinating services.

In the case of projects that provide housing or services to families, that sub recipients will designate a staff person to be responsible for ensuring that children being served in the program are enrolled in school and connected to appropriate services in the community, including early childhood programs such as Head Start, part C of the Individuals with Disabilities Education Act, and programs authorized under subtitle B of title VII of the Act;

Sub-recipients are required to participate in the centralized or coordinated assessment and intake system when it becomes available in our community.

J HMIS: ESG PROGRAM DATA COLLECTION

Client and services information will be collected and recorded using paper forms, and will be entered into the Homeless Management Information System (HMIS) as described in the Procedures section of this manual. Client data on clients served, housing status, and services received must meet HUD standards of completeness and sufficiency. Staff will follow procedures to enter data into HMIS, and will ensure data quality and completeness. Staff will also keep paper forms in a hard copy client file. Any data or documentation not directly entered into or uploaded to the HMIS will be maintained in the paper file.

Program staff may use client records in HMIS for program verification requirements. For example, if a person presents for services and the intake worker is able to view records in HMIS to confirm that the participant came directly from an emergency shelter (e.g. was in emergency shelter the night before), the intake worker does not need to document housing status (e.g. literally homeless), since the HMIS record provides documentation that the person meets HUD's homeless definition.

If the Program staff member is not able to view the HMIS records for a client, then other documentation will be required, and this will be entered into HMIS

K. PROPERTY VERIFICATIONS AND INSPECTIONS: REQUIREMENTS FOR HOMELESSNESS PREVENTION AND RAPID RE-HOUSING

The ESG Program will conduct housing verifications and inspections as required by HUD.

1. Rent Reasonableness

A rent reasonableness assessment will be conducted by the city/county staff prior to paying back rent and emergency rent assistance for a current or new rental property to ensure the rental rates are fair market rates.

Habitability Inspection

When a re-housing client will move into a new rental, a Habitability Inspection is required to ensure minimum habitability standards and will be conducted by a trained City of Tucson or Pima County inspector. Habitability inspections are also required periodically for emergency shelters.

4. Lead-based Paint

A Lead-based Paint visual inspection is required for housing and shelters and will be conducted by a trained City of Tucson or Pima County inspector. Housing will be inspected when both of the following conditions exist for a household that has been approved to receive financial assistance from Project Action:

- a. The rental property is older than 1978, as shown by Pima County property records; and
- b. The client household includes a child less than 6 years of age.

A lead-based paint inspector must be HUD-certified to do a visual assessment for lead based paint.

5. Repeat Inspections

Inspections will be conducted no more than two times. If unit does not pass inspection, one more inspection can be ordered. If the unit doesn't pass inspection a second time, Emergency

Solutions Grant staff will assist the client to move to another property that will satisfy these requirements.

L. GRIEVANCE POLICY

If a client or prospective client disagrees with an ESG Program decision, he/she will be provided with a clearly-defined grievance process. The client will use the grievance process that is in effect at the contracted provider agency that provided the ESG Program service that the client wishes to dispute.

M. FRAUD PREVENTION AND RESPONSE

1. ESG Program intake forms that are used to determine eligibility must be signed by the client, and have statements adjacent to the signature area that inform clients that untruthful information may be considered as fraudulent and can lead to investigation and punishment under federal law.
2. If a staff member suspects that a client has provides fraudulent information, she will inform her supervisor. If necessary the Supervisor will inform the City and County Program Coordinators. The Program Coordinator can consult with the City Attorney and/or County Attorney, and the HUD Inspector General to resolve and report the matter, or to conduct further investigation or prosecution.

N. CONFIDENTIALITY

The ESG Program protects client confidentiality in the following ways.

1. Most clients interact solely with their case manager and do not have personal contact with other Emergency Solutions Grant personnel. The case manager will keep client names and personal information confidential except as it is necessary to discuss cases with a supervisor or with other Emergency Solutions Grant personnel for the purpose of case coordination.
2. When Emergency Solutions Grant staff communicates about client services via email they will not share names or social security numbers. Instead they use client I.D. codes that are used in HMIS.
3. Emergency Solutions Grant staff members and contracted personnel will sign confidentiality agreements, and will not discuss Emergency Solutions Grant clients with anyone except as necessary with Emergency Solutions Grant staff.
4. HMIS data reports will present project data in aggregate form with no identifying information.
5. HMIS data systems will be encoded so that client information is kept secure.
6. Clients are informed about their rights regarding personal information and sign consent forms:

- Informed Consent form, with accompanying Terms of Service form. By signing this form, the client consents to provide information necessary for determining eligibility and providing services.
- Authorization for Use and Sharing of Information. By signing this form, the client consents to have selected information shared with other providers in order to obtain other services or to coordinate care.
- Client Authorization Form for HMIS data.

O. CONFLICTS OF INTEREST

No person who is an employee, agent, consultant, officer, or elected or appointed official of the City of Tucson or Pima County and who exercises or has exercised any functions or responsibilities with respect to ESG activities, or who is in a position to participate in an ESG decision-making process or gain inside information with regard to such activities, may obtain a personal or financial interest or benefit from the activity, or have an interest in any contract, subcontract, or agreement with respect thereto, or the proceeds there under, either for himself or herself or for those with whom he or she has family or business ties, during his or her tenure or for one year thereafter.

P. NONDISCRIMINATION & EQUAL OPPORTUNITY REQUIREMENTS

The ESG Program will ensure that information about ESG Program assistance is made available to all on a nondiscriminatory basis and ensure that all who seek services are provided equal access using the following methods.

1. Outreach information will be provided to a wide range of services providers and community based organizations.
2. To ensure that outreach materials and services are accessible to persons with limited English proficiency, ESG Program will provide information about the program on both the City and Count Websites as well as maintain a hard copy in the respective offices. Staff members will be available who are bilingual in English and Spanish. When persons seeking services speak languages other than English or Spanish, or have vision or hearing disabilities, ESG Program staff will utilize other translation services to ensure fair access.

Q. AFFIRMATIVELY FURTHERING FAIR HOUSING

The ESG Program will ensure that policies and procedures affirmatively further fair housing opportunities for classes protected under the Fair Housing Act, including race, color, national origin, religion, sex, disability, and familial status. Fair housing procedures will include the following:

1. Marketing the program to all eligible persons, including persons with disabilities and persons with limited English proficiency;
2. Making buildings and communications that facilitate applications and service delivery accessible to persons with disabilities
3. Providing fair housing counseling services or referrals to fair housing agencies;
4. Informing participants of how to file a housing discrimination complaint, including providing the toll-free number for the Housing Discrimination Hotline: 1800-669-9777; and

5. Recruiting landlords and service providers in areas that expand housing choice to program participants.

III. ESG PROGRAM COMPONENT POLICIES

A. STREET OUTREACH

The ESG Program may provide the following services to eligible clients in order to connect unsheltered homeless with emergency shelter, housing, or critical services.

- Engagement
- Case Management
- Emergency health and mental health services
- Transportation
- Services for special populations (special populations include homeless youth, homeless persons with HIV/AIDS, and homeless victims of domestic violence, sexual violence, and stalking).

2) Shelter Stay Procedures

3) Essential Services

4) Shelter Outreach Performance Measures

Number of persons:

- Placed in shelter or safe havens
- With more non-cash benefits at program exit
- Participating in case management

B. EMERGENCY SHELTER

The ESG Program may provide for the following services to maintain or convert homeless shelter sites, provide essential services or assist with shelter operations.

- Case management
- Childcare
- Education
- Employment
- Life skills services
- Legal services
- Health
- Mental health
- Substance abuse services
- Transportation
- Services for special populations
- Operations (e.g., maintenance, utilities, furniture, food)

- 1) Policy for Admission
- 2) Policy for Diversion
- 3) Policy for Referral and Assessment of Needs
- 4) Policy for Discharge
- 5) Emergency Shelter Performance Measures
 - Number of persons:
 - Exiting to temporary or transitional housing destinations
 - Exiting to permanent housing destinations
 - Participating in case management

C. HOMELESSNESS PREVENTION

The ESG Program funds may be used to provide housing relocation and stabilization services and rental assistance to those who earn 30% or less of the Area Median Income. Financial assistance will not be provided to a household for a purpose and time period supported by another public source.

- Housing relocation and stabilization services
- Short-and medium-term rental assistance
- Short-term = up to 3 months
- Medium-term = 4 to 24 months
 - Up to 24 months of rental assistance during any 3-year period, including one-time payment for up to 6 months of rent arrears on the tenant's portion of the rent.
- Moving costs
- Rent application fees
- Security deposits
- Last month's rent
- Utility deposit
- Utility payments
- Housing search/ placement
- Housing stability case management
- Mediation and legal services
- Credit repair/ budgeting/ money management

1) Evaluating Eligibility for Assistance for Homelessness Prevention

Minimum requirements to be eligible for Rapid Re-Housing Assistance:

Client eligibility will be assessed in-person. Appointments will be made with the designated providers. During these appointments the clients will be informed about the resources within their community and offered suggestions.

Clients must meet eligibility requirements and provide documentation described below.

Client must:

1. Clients are permitted to have some assets, e.g. car, retirement plan, with maximum of \$3,000 (not including checking and/or savings).
2. Have resided in Pima County for the past three months or longer.
3. Be either
 1. Homeless (based on current HUD homelessness definition), or
 2. Are about to lose their housing due to scheduled eviction or foreclosure, and have no other networks or resources to avoid homelessness, i.e., would become homeless but for this assistance.
4. Have experienced a sudden and significant change making it hard to pay rent or utilities, and, after a short or medium period of assistance, be likely to sustain stable housing on his/her own. Examples of sudden and significant changes include, but are not limited to:
 1. Sudden loss of income
 2. Unforeseen finance set back or life change
 3. Loss of job or reduced hours
 4. Medical issues
 5. Medical bills caused inability to pay other bills
 6. Car repairs
 7. Student Financial Aid disrupted
 8. Divorce or break up of a relationship
 9. Death in family
 10. Lost roommate or other living arrangements
5. Be willing to participate in a case plan that includes goals for improving his/her situation, such as job search activities.
6. Must provide verification documents:
 1. Picture I.D.
 2. Social Security Card
 3. Birth Certificate
 4. Proof of income
 5. Bank statement
 6. Bills that show cause/ need
 7. Proof of residency
 8. Eviction notice or a copy of the Notice of Trustee's sale and has a written lease agreement or a deed that corresponds with the foreclosure documents
 9. Utility disconnect bill or proof of delinquent amount
 10. Invoice for moving assistance
7. Demonstrates ability to maintain their housing and household expenses after assistance

Examples of Reasons the client eligibility may be denied:

- Client does not meet eligibility requirements listed above
- Client did not provide required verification documents
- Client did not agree to having a case plan, or did not follow steps in case plan
- Client used maximum time or assistance allotment
- There were substantiated landlord complaints, and the client did not comply with a correction plan.

- All sub-grantees must evaluate and certify the eligibility of ESG program participants at least once every three months for all household receiving homelessness prevention assistance, and once annually for households receiving rapid re-housing assistances
 - Initial Consultation
 - Sub-recipients must conduct an initial evaluation to determine the eligibility of each individual or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing.
 - Documentation to verify requirements of this section have been met including completing a client in-take form. All sub-grantees must keep verification of this requirement in each client file.
 - Sub-grantees must verify Income below 30% the Area Median Income.
 - Verification of Homelessness or Risk of Homelessness using the HUD definition as described in Section II. B.
 - The sub-grantee must confirm that the individual or family does not have sufficient resources or support networks.
 - To receive assistance under Homeless Prevention, a client(s) must be at risk of becoming homeless and rental assistance is only necessary to prevent the individual or family from moving into an emergency shelter or another place.

2) Determining and Prioritizing Homeless Prevention Assistance

The purpose of the ESG program is to provide assistance to as many individuals and families who face obstacles to sustaining housing as possible. An individual or family's ability to sustain housing is not a threshold requirement. The program will focus on helping individuals and families overcome their immediate housing obstacles and connect them with the resources they need to stay housed when the program ends.

Sub-grantees will target assistance to families and individuals who are homeless or who are about to spend their first night at in a shelter or on the street. These families and individuals will be prioritized as follows.

Priority 1: Homeless Families

- Priority 1(a): The homeless family who is in the emergency shelter for less than 30 days
- Priority 1(b): The homeless family who has been living on the streets (places not meant for human habitation) for less than 30 days
- Priority 1 (c): the homeless family who has been in the emergency shelter for over 30 days
- Priority 1 (d): The homeless family or who has been living on the streets for over 30 days

Priority 2: Homeless Youth

- Priority 2(a): The homeless youth who is in the emergency shelter for less than 30 days
- Priority 2(b): The homeless youth who has been living on the streets (places not meant for human habitation) for less than 30 days
- Priority 2 (c): the homeless youth who has been in the emergency shelter for over 30 days
- Priority 2 (d): The homeless youth or who has been living on the streets for over 30 days

Priority 3: Homeless Individual

- Priority 3(a): The homeless individual who is in the emergency shelter for less than 30 days
- Priority 3(b): The homeless individual who has been living on the streets (places not meant for human habitation) for less than 30 days
- Priority 3 (c): the homeless individual who has been in the emergency shelter for over 30 days
- Priority 3 (d): The homeless individual or who has been living on the streets for over 30 days

3) Rent & Utilities Policy: Homeless Prevention

Rent

Sub-grantees will require program participants to pay a portion of the rent expense based on the individual or families' available income (up to thirty percent 30%). Participants are expected to contribute a portion of their income to pay for rent. Household income and rent contribution will be calculated based on household available income at the time of certification. Any household income increase must be reported to the sub-grantee within seven (7) days and the new rent contribution amount adjusted. Income shall be reassessed every three months for medium term rental assistance.

Sub-grantees may increase the household's contribution to the rent and utility cost as they acquire more financial independence and stability. An increase will be documented in the client's plan.

Rental assistance may be used to pay up to 3 months of rental arrears for eligible program participants. Rental arrears may be paid if the payment enables the program participant to return to the housing unit for which the arrears are being paid or move to another unit.

Rental arrears may be paid regardless of when they were incurred, provided that the existence of arrears prevents the eligible participant from obtaining housing. Payment for rental arrears must be included in determining the total period of the program participant's rental assistance, which may not exceed 24 months in a 3 year period.

Rental assistance cannot exceed the actual rental costs. Rental assistance payments cannot be made on behalf of eligible participants for the same period of time that rental assistance is being provided through another federal, state or local housing subsidy program.

Sub-grantees providing rental assistance for homeless prevention will be required to conduct initial and any appropriate follow-up habitability inspections of housing units into which a program participant will be moving. Units must be inspected on an annual basis and upon a change of tenancy. In addition, Lead Based Paint requirements must be met when applicable.

When a rental unit has been located, sub-grantees may need to assist the client in contacting the landlord to complete the appropriate paperwork and conduct a habitability standards inspection. Agencies must have acceptable documentation showing a participant in need of rental assistance. Documentation may be in the form of an eviction notice from a landlord or a letter stating intent to evict.

Sub-grantees must use fair market rent standard to determine eligibility. Sub-grantees should assist program participants to locate a rental unit at or below fair market rent.

Security Deposits and Utility Deposits

ESG Program funds may be used to pay security deposits and utility deposits. Security and utility deposits may only be paid with ESG funding if the program participant will otherwise be homeless without assistance.

Security and utility deposits covering the same period of time in which other assistance is being provided through another housing subsidy program are eligible, as long as they cover different costs types.

Security and utility deposits may be paid as a one-time grant not to exceed the monthly rental amount. Information documenting the need for a security deposit should be obtained at the same time the required rental paperwork is being completed by the client and landlord.

Sub-grantees must conduct a habitability standards inspection on any unit that a program participant will be moving into using ESG program funds for a security or utility deposit. Agencies must certify that the unit has passed habitability standards before any ESG program funds will be released.

Utility Payments

ESG Program funds may be used for up to 6 months of utility payments, including up to 3 months of utility payments in arrears. The program participant, or a member of the participant's household, must have an account in his/her name with a utility company. The participant must have a lease with their name on it to prove residency and verify address of utility service. Copies of the proof of responsibility should be obtained and maintained in the client file. Utility payments will be made directly to the utility company. Documentation must be made to verify that the participant is not receiving the same type of assistance from another agency for the same period. Also, if utility assistance payments are available from another agency this source should be used first before ESG funds are provided.

4. Standards for Determining Length and Level of Assistance for Homeless Prevention
 - No participant may receive more than 24 months of assistance within a 3 year period.
 - The maximum amount of assistance is based on FMR less the households 30% of monthly income.
 - The maximum number of times the program participant may receive assistance is based on need but may not exceed more than 24 months of assistance in a 3 year period.
 - Short-term rental assistance is to be limited to a maximum of 3 months of rent
 - Medium-rental assistance shall extend for more than 3 months but not more than 24 months of rent.
 - Only the assistance that is needed for a client to become stabilized will be provided.

5. Homeless Prevention Performance Standards

Number of persons:

- Who maintained their permanent housing for 6 months or longer
- Exiting to permanent housing destinations
- With higher income at program exit
- With more non-cash benefits at program exit
- Participating in case management

D. RAPID REHOUSING

The ESG Program can be utilized to fund housing relocation and stabilization services and rental assistance to individuals and families who can quickly be transitioned into permanent housing and a stable environment. Financial assistance will not be provided to a household for a purpose and time period supported by another public source.

- Housing relocation and stabilization services
- Short-and medium-term rental assistance
 - Short-term = up to 3 months
 - Medium-term = 4 to 24 months
 - Up to 24 months of rental assistance during any 3-year period, including one-time payment for up to 6 months of rent arrears on the tenant's portion of the rent.
- Moving costs
- Rent application fees
- Security deposits
- Last month's rent
- Utility deposit
- Utility payments
- Housing search/ placement
- Housing stability case management
- Mediation and legal services
- Credit repair/ budgeting/ money management

1) Evaluating Eligibility for Assistance for Rapid Re-Housing

Minimum requirements to be eligible for Rapid Re-Housing Assistance:

Client eligibility will be assessed in-person. Appointments will be made with the designated providers. During these appointments the clients will be informed about the resources within their community and offered suggestions.

Clients must meet eligibility requirements and provide documentation described below.

1. Clients are permitted to have some assets, e.g. car, retirement plan, with maximum of \$3000 in liquid assets (readily available money).

2. Have resided in Pima County for the past three months or longer.
3. Be either
 1. Homeless (based on current HUD homelessness definition), or
 2. Are about to lose their housing due to scheduled eviction or foreclosure, and have no other networks or resources to avoid homelessness, i.e., would become homeless but for this assistance.
4. Have experienced a sudden and significant change making it hard to pay rent or utilities, and, after a short or medium period of assistance, be likely to sustain stable housing on his/her own. Examples of sudden and significant changes include, but are not limited to:
 1. Sudden loss of income
 2. Unforeseen finance set back or life change
 3. Loss of job or reduced hours
 4. Medical issues
 5. Medical bills caused inability to pay other bills
 6. Car repairs
 7. Student Financial Aid disrupted
 8. Divorce or break up of a relationship
 9. Death in family
 10. Lost roommate or other living arrangements
5. Be willing to participate in a case plan that includes goals for improving his/her situation, such as job search activities.
6. Must provide verification documents:
 1. Picture I.D.
 2. Social Security Card
 3. Birth Certificate
 4. Proof of income
 5. Bank statement
 6. Bills that show cause/ need
 7. Proof of residency
 8. Eviction notice or a copy of the Notice of Trustee's sale and has a written lease agreement or a deed that corresponds with the foreclosure documents
 9. Utility disconnect bill or proof of delinquent amount
 10. Invoice for moving assistance
7. Demonstrates ability to maintain their housing and household expenses after assistance

Examples of Reasons the client eligibility may be denied:

- Client does not meet eligibility requirements listed above
- Client did not provide required verification documents
- Client did not agree to having a case plan, or did not follow steps in case plan
- Client used maximum time or assistance allotment

- There were substantiated landlord complaints, and the client did not comply with a correction plan.
- All sub-grantees must evaluate and certify the eligibility of ESG program participants at least once every three months for all household receiving homelessness prevention assistance, and once annually for households receiving rapid re-housing assistances
 - Initial Consultation
 - Sub-recipients must conduct an initial evaluation to determine the eligibility of each individual or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing.
 - Documentation to verify requirements of this section have been met include completing a client in-take form. All sub-grantees must keep verification of this requirement in each client file.
 - Verification of Homelessness or Risk of Homelessness using the HUD definition as described in Section II. B.
 - The sub-grantee must confirm that the individual or family does not have sufficient resources or support networks.
 - To receive assistance under HOMELESSNESS PREVENTION client(s) must be at risk of becoming homeless and rental assistance is only necessary to prevent the individual or family from moving into an emergency shelter or another place.

2) Determining and Prioritizing Rapid Re-Housing Assistance

The purpose of the ESG program is to provide homeless prevention assistance to as many homeless individuals and families who face obstacles to obtaining and sustaining housing as possible. An individual or family's ability to sustain housing is not a threshold requirement. The program will focus on helping individuals and families overcome their immediate housing obstacles and connect them with the resources they need to stay housed when the program ends.

Sub-grantees will target assistance to families and individuals who are homeless or who are about to spend their first night at in a shelter or on the street. These families and individuals will be prioritized as follows.

Priority 1: Homeless Families

- Priority 1(a): The homeless family who is in the emergency shelter for less than 30 days
- Priority 1(b): The homeless family who has been living on the streets (places not meant for human habitation) for less than 30 days
- Priority 1 (c): the homeless family who has been in the emergency shelter for over 30 days
- Priority 1 (d): The homeless family or who has been living on the streets for over 30 days

Priority 2: Homeless Youth

- Priority 2(a): The homeless youth who is in the emergency shelter for less than 30 days
- Priority 2(b): The homeless youth who has been living on the streets (places not meant for human habitation) for less than 30 days

- Priority 2 (c): the homeless youth who has been in the emergency shelter for over 30 days
- Priority 2 (d): The homeless youth or who has been living on the streets for over 30 days

Priority 3: Homeless Individual

- Priority 3(a): The homeless individual who is in the emergency shelter for less than 30 days
- Priority 3(b): The homeless individual who has been living on the streets (places not meant for human habitation) for less than 30 days
- Priority 3 (c): the homeless individual who has been in the emergency shelter for over 30 days
- Priority 3 (d): The homeless individual or who has been living on the streets for over 30 days

3) Rent & Utilities Policy: Rapid Re-Housing

Rent

Sub-grantees will require program participants to pay a portion of the rent expense based on the individual or families' available income thirty percent (30%) or less. Participants are expected to contribute a portion of their income to pay for rent. Household income and rent contribution will be calculated based on household available income at the time of certification. Any household income increase must be reported to the sub-grantee within seven (7) days and the new rent contribution amount adjusted. Income shall be reassessed every three months for medium term rental assistance.

Sub-grantees may increase the household's contribution to the rent and utility cost as they acquire more financial independence and stability. An increase will be documented in the client's plan.

Rental assistance may be used to pay up to 3 months of rental arrears for eligible program participants. Rental arrears may be paid if the payment enables the program participant to return to the housing unit for which the arrears are being paid or move to another unit.

Rental arrears may be paid regardless of when they were incurred, provided that the existence of arrears prevents the eligible participant from obtaining housing. Payment for rental arrears must be included in determining the total period of the program participant's rental assistance, which may not exceed 24 months in a 3 year period.

Rental assistance cannot exceed the actual rental costs. Rental assistance payments cannot be made on behalf of eligible participants for the same period of time that rental assistance is being provided through another federal, state or local housing subsidy program.

Sub-grantees providing rental assistance for rapid re-housing will be required to arrange initial and any appropriate follow-up habitability inspections of housing units into which a program participant will be moving. Units must be inspected on an annual basis and upon a change of tenancy. In addition, Lead Based Paint requirements must be met when applicable.

When a rental unit has been located, sub-grantees may need to assist the client in contacting the landlord to complete the appropriate paperwork and conduct a habitability standards inspection. Agencies must have acceptable documentation showing a participant in need of rental assistance. Documentation may be in the form of an eviction notice from a landlord or a letter stating intent to evict.

Sub-grantees must use fair market rent standard to determine eligibility. Sub-grantees should assist program participants to locate a rental unit at or below fair market rent.

Security Deposits and Utility Deposits

ESG Program funds may be used to pay security deposits and utility deposits. Security and utility deposits may only be paid with ESG funding if the program participant will otherwise be homeless without assistance.

Security and utility deposits covering the same period of time in which other assistance is being provided through another housing subsidy program are eligible, as long as they cover different costs types.

Security and utility deposits may be paid as a one-time grant not to exceed the monthly rental amount. Information documenting the need for a security deposit should be obtained at the same time the required rental paperwork is being completed by the client and landlord.

Sub-grantees must conduct a habitability standards inspection on any unit that a program participant will be moving into using ESG program funds for a security or utility deposit. Agencies must certify that the unit has passed habitability standards before any ESG program funds will be released.

Utility Payments

ESG Program funds may be used for up to 6 months of utility payments, including up to 6 months of utility payments in arrears. The program participant, or a member of the participant's household, must have an account in his/her name with a utility company. The participant must have a lease with their name on it to prove residency and verify address of utility service. Copies of the proof of responsibility should be obtained and maintained in the client file. Utility payments will be made directly to the utility company. Documentation must be made to verify that the participant is not receiving the same type of assistance from another agency for the same period. Also, if utility assistance payments are available from another agency this source should be used first before ESG funds are provided

4) Standards for Determining Length and Level of Assistance for Rapid Re-Housing

- No participant may receive more than 24 months of assistance within a 3 year period.
- The maximum amount of assistance is based on FMR less the households 30% of monthly income.
- The maximum number of times the program participant may receive assistance is based on need but may not exceed more than 24 months of assistance in a 3 year period.
- Short-term rental assistance is to be limited to a maximum of 3 months of rent
- Medium-rental assistance shall extend for more than 3 months but not more than 24 months of rent.
- Only as much assistance needed to become stabilized will be provided.

5) Rapid Re-Housing Performance Standards

Number of persons:

- Who maintained their permanent housing for 6 months or longer
- Exiting to permanent housing destinations
- With higher income at program exit
- With more non-cash benefits at program exit
- Participating in Case Management

E. INELIGIBLE SERVICES NOT PROVIDED BY THE ESG PROGRAM

- Mortgage costs
- Credit card bills or other consumer debt
- Pet care
- Entertainment activities
- Cash assistance directly to participants

F. TERMINATION OF ASSISTANCE

A sub-grantee may terminate assistance to a program participant who violates program requirements. Sub-grantees may resume assistance to a program participant whose assistance was previously terminated. In terminating assistance to a program participant, the sub-grantee must provide a formal process that recognizes the rights of individuals receiving assistance to due process of law.

For Homeless Prevention and Rapid Re-Housing rental assistance the process of termination, at minimum, must consist of:

- A. Written notice to the program participant containing a clear statement of the reasons for terminations;
- B. A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person who made or approved the termination decisions; and
- C. Prompt written notice of the final decision to the program participant

IV. ESG PROGRAM ADMINISTRATION

3. Procedures for Annual Plan and CAPER Reports
4. Use of IDIS
5. Monitoring Direct Service Contractors
 - a. Purpose
 - b. Frequency
 - c. Findings
 - d. Follow-up Procedures

V. SUMMARY OF ESG PROGRAM PERFORMANCE STANDARDS

Pima County and the City of Tucson in consultation with the Continuum of Care will develop performance standards that will provide measures to evaluate the effectiveness of 1) Targeting

those who need the assistance the most; 2) reducing the number of people living on the streets and emergency shelters; 3) shortening the time people spend homeless; and 4) reducing each program participant's housing barriers or housing stability risks.

ESG Program Performance Standards	
Activity	Outcome/ Outputs
Street Outreach	Number of persons: <ul style="list-style-type: none"> Placed in shelter or safe havens With more non-cash benefits at program exit Participating in case management
Emergency Shelter	Number of persons: <ul style="list-style-type: none"> Exiting to temporary or transitional housing destinations Exiting to permanent housing destinations Participating in case management
Homelessness Prevention	Number of persons: <ul style="list-style-type: none"> Who maintained their permanent housing for 6 months or longer Exiting to permanent housing destinations With higher income at program exit With more non-cash benefits at program exit Participating in case management
Rapid Re-Housing	Number of persons: <ul style="list-style-type: none"> Who maintained their permanent housing for 6 months or longer Exiting to permanent housing destinations With higher income at program exit With more non-cash benefits at program exit Participating in Case Management

Appendix E

Continuum of Care (COC) Program Written Standards

**TUCSON PIMA COLLABORATION TO END HOMELESSNESS
COC PROGRAM WRITTEN STANDARDS
Adopted May 11, 2017**

Introduction & Purpose
Key Terms
General Policies
Performance Standards
Permanent Supportive Housing
Rapid Rehousing
Transitional Housing
Evaluating and Documenting Eligibility (Categories of Homelessness & Required Types of Verification)
Appendices

INTRODUCTION & PURPOSE

Tucson Pima Collaboration to End Homelessness (TPCH) has established written standards that encompass local community needs and follow guidelines set forth by the Department Housing and Urban Development (HUD) and comply with requirements established by law and HUD Notice. These written standards are developed to ensure people within this community who are experiencing homelessness are prioritized and provided with the most appropriate housing and services to meet their needs.

These written standards are reviewed and adjusted at least annually. Changes to priorities may supersede this notice if voted on by the TPCH Board of Directors (for example; a surge in prioritizing veterans). Further requirements are detailed in TPCH Policy and Procedure documents.

These written standards are developed in coordination with recipients of Emergency Solutions Grants program funds to achieve the following:

- Create and maintain a centralized or coordinated entry system that provides an initial, comprehensive assessment of the needs of families and individuals for housing and services
- Policies and procedures for evaluating individuals' and families' eligibility for assistance under this part.
- Policies and procedures for determining and prioritizing which eligible families and individuals will receive transitional housing assistance.
- Policies and procedures for determining and prioritizing which eligible families and individuals will receive rapid rehousing assistance.
- Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance.
- Policies and procedures for determining and prioritizing which eligible families and individuals will receive permanent supportive housing assistance

KEY TERMS

Beds

A bed is each assigned spot in a housing program for a person; not literally a bed. If there are three people in a household, regardless of their sleeping arrangements, the household has three beds.

Client-Centered

Client-centered (or person-centered) services are designed and delivered based on the specific needs and wants of each family or individual as they perceive those needs and wants rather than as required or delivered by the service provider based on a schedule, program participation, or the providers' perception. A client-centered service delivery process involves mutual discussion and decision-making on what steps are needed for client stability and when and how to take those steps. For example, client-centered service could include, but not be limited to, determining a family's preferences and helping them find housing that is not just to their needs and liking, but also near a particular school.

Chronically Homeless

An individual or family is chronically homeless when the person or head of household (adult or minor) meets all three criteria established as the final rule for 24 CFR Parts 91 and 578 as amended December 4, 2015. The three criteria are that the person/family:

- Has a qualifying disability (a diagnosable substance use disorder, serious mental illness, developmental disability, post traumatic stress disorder, cognitive impairments resulting from a brain injury, or chronic physical illness or disability)
- Is literally homeless (at the time of eligibility assessment for a specific project opening)
- Has at least 12 months of homelessness from one of the below avenues:
 - The current episode of homelessness has lasted at least the past 365 nights, including the night before assessment, without breaks in homelessness.
 - Having four episodes, or more, of homelessness within the past three years up to and including the date of assessment. These episodes, when added together, total 365 nights or more of literal homelessness. Also, each break in homelessness must have lasted at least seven (7) consecutive nights.
 - Both the cumulative nights and four or greater episodes criteria must be met. Fewer than four episodes in three years – even if homeless nights add up to 12 or more months – will not qualify the person/family as chronically homeless. Greater than four episodes in three years will not suffice if the total nights homeless are under 365.

Equal Access:

This community provides equal access to all programs and activities, regardless of (actual or perceived) sexual orientation, gender identity, marital status, race, color, national origin, religion, sex, familial status, disability, or any other protected class as identified by Federal or Local law.

This community houses people based on the gender they identify as, without requesting documentation to validate their report. This community recognizes the HUD Final Rule and all amendments published 2/3/2012, 9/21/16 and the Notice on Equal Access Regardless of Sexual Orientation, Gender Identity, or Marital Status for HUD's CPD Programs.

Gender Identity

This is defined as a person's concept of oneself as male, female, both or neither. Gender identity may or may not align with the "sex" or "gender" described on an individual's birth certificate or other identity documents.

Homeless

HUD classifies homelessness into categories, or levels, of homelessness. These include literally homeless, imminent risk of homelessness and chronically homeless and are detailed in the Evaluating and Documenting Eligibility (Categories of Homelessness & Required Types of Verification) section of this document.

Unsheltered: People are considered homeless, and unsheltered, when they are living in places not meant for human habitation.

Sheltered: People are considered homeless, yet sheltered, when they are staying in places meant for human habitation, emergency shelters, transitional housing, or facing imminent homelessness.

Housing First

Housing First is an approach in which housing is offered to people experiencing homelessness without preconditions (such as sobriety, mental health treatment, or a minimum income threshold) or service participation requirements. Rapid placement and stabilization in permanent housing are primary goals. Service participation is not required for continued tenancy. Projects that use a Housing First approach promote the acceptance of applicants regardless of their sobriety or use of substances, completion of treatment, or participation in services, yet offer assertive engagement in support and treatment options to the participants who are housed.

LGBTQ

This is an acronym for "lesbian, gay, bisexual, transgender or transsexual, questioning or queer." It is intended to emphasize a diversity of sexuality and gender identities, including identities that do not fall within the binary of "male" and "female," and may be used to refer to anyone who self-identifies as non-heterosexual.

Permanent Supportive Housing (PSH)

Permanent Supportive Housing is rental assistance with supportive services without a designated length of stay to assist homeless persons with a disability to live independently and achieve housing stability.

Rapid Rehousing (RRH)

Rapid Rehousing Assistance is client-centered housing relocation and stabilization services with short and/or long term rental assistance. RRH helps an individual or family move as quickly as possible into permanent housing and achieve stability in that housing.

Safe Haven

A Safe Haven is a temporary supportive housing program that serves hard-to-reach literally homeless persons with severe mental illness who come primarily from the streets and have been unable or unwilling to participate in housing or supportive services. These facilities allow 24-hour residence for an unspecified duration, have private or semi-private accommodations, and provide access to needed, but not required, services in a low demand facility.

Severity of Service Needs

TPCH classifies service needs into four categories; Severe, High, Moderate and Low. Families and Individuals are classified via the SPDAT score indicates which level of service needs the individual or family will be classified as.

	VI SPDAT			Full SPDAT	
	Individuals	Youth	Families	Individuals/Youth	Families
Severe Service Needs	12-17	12-17	12-22	45-60	66-80
High Service Needs	8-11	8-11	9-11	35-44	54-65
Moderate Service Needs	4-7	4-7	4-8	20-34	27-53
Low Service Needs	0-3	0-3	0-3	0-19	0-26

An individual or family is considered to have a high severity of services needs when at least one of the following is true:

- History of high utilization of crisis services, which include but are not limited to, emergency rooms, jails, and psychiatric facilities; or
- Significant health or behavioral health challenges or functional impairments which require a significant level of support in order to maintain permanent housing.
- For youth and victims of domestic violence, there is a high risk of continued trauma or high risk of harm or exposure to very dangerous living situations.
- When applicable CoC Program-funded PSH may use alternate criteria used by state Medicaid departments to identify high-need, high-cost beneficiaries.

The determination is not to be based on a specific diagnosis or disability type. The determination will not be based on any factors that would result in a violation of any nondiscrimination and equal opportunity requirements. (See 24 CRF § 5.105 (a).)

Families and individuals with low service needs will not be served in CoC-funded projects.

SPDAT (Service Prioritization Decision Assistance Tool)

The SPDAT portfolio consists of evidence-based, standardized assessment tools that allow providers to effectively assess the severity of service needs for people experiencing homelessness. TPCH utilizes SPDAT scores for prioritization of families and individuals for housing resources. The Vulnerability Index (VI) SPDAT is utilized for pre-screening families, individuals, and youth. The Full SPDAT assessment also has versions for these populations. These SPDATs are more in-depth assessments and case management tools.

Transitional Housing (TH)

Transitional housing provides homeless families and individuals with the interim stability and support to successfully move to and maintain permanent housing. Homeless persons may live in transitional housing for up to 24 months and receive support services that help them live more independently.

TPCH

Tucson Pima Collaboration to End Homelessness (TPCH) is a coalition of community and faith-based organizations, government entities, businesses, and individuals committed to the mission of ending homelessness, advocating for and addressing the issues related to homelessness in our community, and acting as the U.S. Department of Housing and Urban Development (HUD) Continuum of Care (CoC) for the geographic area of Tucson and Pima County, Arizona.

Victim Service Provider

A victim service provider is an organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, stalking or human trafficking.

GENERAL POLICIES

Family Admission and Non-Separation
Ensuring Educational Rights
Persons Fleeing Domestic Violence
Persons Identifying as LGBTQ
Housing First

Family Admission and Non-Separation

Consistent with the CoC Program Interim Rule 578.93, neither CoC nor ESG program-funded grant recipients and subrecipients may involuntarily separate families. The age and gender of a child under age 18 will not be used as a basis for denying any family's admission to a project that receives CoC or ESG funds. The gender, sexual orientation and/or marital status of a parent or parents will also not be used as a basis for denying any family's admission to a project that receives CoC or ESG funds.

The CoC will work closely with providers to ensure that placement efforts are coordinated to avoid involuntary family separation, including referring clients for the most appropriate services and housing to match their needs. Any client who believes that they or a family member has experienced involuntary separation may report the issue to the CoC through www.tpch.net and "Contact TPCH". The CoC will investigate the claim and take appropriate remedial action.

Ensuring Educational Rights

Consistent with the CoC Program Interim Rule 578.23 and 578.93 (e), all CoC and ESG program funded recipients and subrecipients assisting families with children or unaccompanied youth must:

1. Take into account the educational needs of children when placing families in housing and will, to the maximum extent practicable, place families with children as close as possible to their school of origin so as not to disrupt such children's education.
2. Inform families with children and unaccompanied youth of their educational rights, including providing written materials, provide linkage to McKinney Vento Liaisons (including assistance with enrollment if needed) as part of intake procedures.
3. Not require children and unaccompanied youth to enroll in a new school as a condition of receiving services.
4. Allow parents or the youth (if unaccompanied) to make decisions about school placement.
5. Not require children and unaccompanied youth to attend after-school or educational programs that would replace/interfere with regular day school or prohibit them from staying enrolled in their original school.
6. Post notices of educational rights at each program site that serves homeless children and families in appropriate languages.
7. Designate a staff member who will be responsible for:
 - a. ensuring that homeless children and youth in their programs are in school and are receiving all educational services to which they are entitled.
 - b. coordinating with the local McKinney Vento Educational Coordinator and Liaison, the appropriate school district, the CoC, and other mainstream providers as needed.
 - c. facilitating unaccompanied youth who have not obtained a high school diploma or certificate of General Educational Development (GED) to obtain such a credential and ensuring that unaccompanied youth are connected to appropriate services in the community.

Clients who believe that their educational rights have not been observed may report the issue to the CoC through www.tpch.net and "Contact TPCH".

Persons Fleeing Domestic Violence

Consistent with the CoC Program Interim Rule 24 CFR Part 578.5 (8), all CoC program funding recipients and subrecipients will provide safe, confidential and equal access to TPCH's "no wrong door" coordinated entry process and referrals to either

domestic violence service providers or CoC or ESG funded project recipients and subrecipients for families and individuals who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking regardless of whether or not they consent to share their data through the HMIS.

The CoC will work closely with ESG and domestic violence service providers to ensure that any individual or family fleeing as described above will have the opportunity through coordinated entry and in accordance with the CoC's Coordinated Entry Policies and Procedures to be safely, confidentially and immediately transferred to a domestic violence services provider, if desired. While domestic violence service providers do not participate in the TPCCH HMIS, these providers are encouraged to obtain from their clients consent for confidential staffing (using de-identified data) and referral to housing and services from other providers through the coordinated entry as desired and needed by clients. If individuals or families fleeing domestic violence do not desire such a transfer, they may be assessed and/or undergo intake through the normal coordinated entry system.

All CoC grant recipients and subrecipients within the CoC geographic area will make all efforts to: protect the privacy and safety of domestic violence survivor; uphold client choice by presenting a range of housing and service options; and ensure that housing, once established, is not endangered because of reports of domestic violence or re-victimization. TPCCH will offer staff training on dealing with those fleeing domestic violence and/or trauma informed care no less than annually.

In compliance with under §578.51 (c)(3), any program participants who have complied with all program requirements during their residence and who have been a victim of domestic violence, dating violence, sexual assault, or stalking, and who reasonably believe they are imminently threatened by harm from further domestic violence, dating violence, sexual assault, or stalking (which would include threats from a third party, such as a friend or family member of the perpetrator of the violence), if they remain in the assisted unit, and are able to document the violence and basis for their belief, may retain the rental assistance and may move to a different CoC geographic area if they move out of the assisted unit to protect their health and safety and the CoC to which they are moving did not participate in the decision to move.

For each program participant who elects to move to a different CoC due to imminent threat of further violence under §578.51 (c) (3), the CoC project in which they participated must retain:

1. Documentation of the original incidence of violence.
2. Documentation of the reasonable belief of imminent threat of further violence. This would include threats from a third party, such as a friend or family member of the perpetrator of the violence.

In either case, the documentation may be the housing or service provider's written observation; a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider or other professional from whom the victim has sought assistance; medical or dental records; court or law enforcement records; or written certification by the program participant to whom the violence occurred or by the head of household.

Persons Identifying as LGBTQ

Consistent with the CoC Program Interim Rule 578.93 (a), final rule 77 FR 21 5662 and CPD-15-02, all CoC recipients and subrecipients will make available their housing and services to families and individuals without regard to actual or perceived sexual orientation, gender identity (whether actual or perceived gender-related characteristics), or marital status. In addition, CoC and ESG program funded recipients and subrecipients will:

1. Recognize that biological sex as reported at birth may not correspond to an individual's gender identity, ask about gender identity or sexual orientation to determine eligibility if the facility to which the individual client seeks admission has shared sleeping areas or bathrooms, or to determine the number of bedrooms to which a household may be entitled.
2. Provide access to shelter and housing programs based on a person's self-identified gender, taking health and safety, and non-binary gender identity concerns into consideration.
3. Neither request documentation of a person's sex, anatomy or medical history in order to determine appropriate placement nor deny access to a single-sex emergency shelter or facility solely because the individual's identity documents indicate a sex different than the gender with which the client or potential client identifies or because his or her appearance or behavior does not conform to gender stereotypes; nor consider a person ineligible for any facility based on the factors outlined above.
4. Maintain the confidentiality of any individual's disclosure regarding their sexual orientation or gender identity; notify persons who identify as LGBTQ when and to whom that identification may be shared during referrals; and, during

intake, inquire about a client's preference regarding the disclosure or non-disclosure to some or all staff of their stated orientation and/or gender identity, and then abide by that preference.

5. Neither isolate nor segregate a client based on gender identity unless by that client's request or for that client's safety. HUD assumes that a provider will not make an assignment or re-assignment based on complaints of another person when the sole stated basis of the complaint is a client or potential client's non-conformance with gender stereotypes.
6. Take reasonable steps to address any concerns expressed by a client or observed by a provider regarding safety or privacy. Whenever physically possible, providers will ensure that toilet stalls have doors and locks and that separate shower stalls are available. When these physical amenities are not available, providers will work with individuals (to the extent possible within the physical layout of their facility) to provide accommodations such as: addition of a privacy partition or curtain; use of a nearby private restroom or office; or a separate changing schedule.
7. Ensure that all recipient and subrecipient staff members and contractors who interact directly with potential and current clients are aware of these rules and guidelines through at least annual training, and take prompt corrective action to address noncompliance as reported through www.tpch.net and "Contact TPCH".

Housing First

These Written Standards establish that all Permanent Supportive Housing (PSH) and Rapid Rehousing (RRH) Projects adopt the Housing First model.

Housing First is an approach to quickly and successfully connect families and individuals to permanent housing. Housing First programs do not create barriers to entry such as sobriety, treatment or service participation requirements. Supportive services are offered to maximize housing stability and prevent returns to homelessness.

Housing First considers all participants as "housing ready" vs only those participants that have completed treatment or achieved sobriety. There are no programmatic prerequisites to program entry such as minimum income, sobriety or treatment requirements. Programs fill their vacancies with households selected through the Coordinated Entry process.

All attempts are made to streamline the move-in process by aiding households with the eligibility process and by obtaining documents per the HUD regulations, which provide a grace period for obtaining chronic homeless documentation when it cannot be obtained at the time of housing offer of move-in. (See Timelines for Obtaining Documentation of Chronic Homelessness) This community's Housing First programs do not require chronic homeless documentation prior to program entry.

Housing First programs recognize tenant rights, responsibilities, and legal protections. Programs educate participants on these topics such as lease terms and Fair Housing. Program managers abide by these laws; projects respect tenant rights while providing services.

Housing First programs seek to maintain housing for participants through practices that provide services to build skills and seek leniency whenever possible. For example, the program will offer budgeting classes and seek a payment plan instead of seeking eviction for a participant failing to pay his or her rent.

Supportive services support recovery while respecting client choice. Participants are not forced into treatment but are continually offered a wide array of services and supports understanding that participants may decline them. There are no penalties for declining services within Housing first programs.

PERFORMANCE STANDARDS

TPCH requires that Project Recipients meet the following benchmarks for grants and financial management that communities must reach to meet this Standard of Recipient Performance. (Per 24 CFR 578 and the FY2015 NOFA)

1. Partner with established integrated health care relationships to ensure coverage for all participants.
2. Partner with employment resources to ensure participants have access to job training and development resources as needed.
3. Work closely with participants to access all mainstream benefits for which they are eligible.
4. Submit Annual Performance Reports by the deadline.
5. Avoid or resolve HUD monitoring findings, or OIG Audits, if applicable.
6. Maintain quarterly drawdowns
7. Fully expend awarded funds.
8. Maintain full and high quality participation in the TPCH HMIS.
9. Maintain full and high quality participation in the TPCH Coordinated Entry system.

PERMANENT SUPPORTIVE HOUSING

Community Priorities

Priorities for those who will receive assistance with Permanent Supportive Housing programs.

- Beds dedicated and prioritized to serve families and individuals facing chronic homelessness
- Beds that are not dedicated or prioritized to serve families and individuals facing chronic homelessness

Documentation and Move-In Requirements

- Timelines for obtaining documentation of Chronic Homelessness
- Timelines for accessing housing

Community Priorities

When housing members of the community, this community prioritizes families and individuals with severe service needs who have experienced two or more years of homelessness. This community follows guidelines set forth in (Notice: CPD-16-11). Case conferencing will be used to further ensure appropriate matching, client choice, and navigation into housing and associated support services offerings.

Due diligence should be exercised when conducting outreach and assessment to ensure that persons are served in the order of priority in these standards, and as adopted by the CoC. HUD recognizes that some persons – particularly those living on the streets or in places not meant for human habitation – might require significant engagement and contacts prior to their entering housing and recipients are not required to keep units vacant where there are persons who meet a higher priority within the CoC and who have not yet accepted the PSH opportunities offered to them. Street outreach providers should continue to make attempts with those persons using a Housing First approach to place as few conditions on a person's housing as possible.

Service needs, defined in detail in the key terms section of this document, are categorized as Severe, High, Moderate, and Low as measured by use of the tools in the SPDAT portfolio.

Beds Classified as Dedicated or Prioritized for Chronically Homeless (CH)

See the key terms section for the definition of Chronic Homelessness.

TPCH seeks to end chronic homelessness. Certain CoC-funded beds have been dedicated or prioritized to serve families and individuals experiencing chronic homelessness. Only persons experiencing chronic homelessness (CH) will be served in CH-dedicated or CH-prioritized beds until all people facing chronic homelessness within our geographic boundaries have been offered housing. TPCH recognizes those with severe service needs who have been homeless for two years or more over the course of their lives as prioritized for housing. We give first opportunity to those who are unsheltered. Families and individuals with moderate and low service needs are not currently served with these beds.

TPCH prioritizes these beds as follows:

- 1) Severe Service Needs & 2+ years homeless & unsheltered
- 2) Severe Service Needs & 2+ years homeless & sheltered

When priority populations are housed, TPCH will offer housing to the remaining families and individuals facing CH as follows:

- 3) Severe Service Needs & Less than 2 years homeless & unsheltered
- 4) Severe Service Needs & Less than 2 years homeless & sheltered
- 5) High Service Needs & 2+ years homeless & unsheltered
- 6) High Service Needs & 2+ years homeless & sheltered
- 7) High Service Needs & Less than 2 years homeless & unsheltered
- 8) High Service Needs & Less than 2 years homeless & sheltered

Beds Classified as Not Dedicated or Prioritized for CH

This community will follow the above prioritization levels for these beds until the community has determined that we have housed families and individuals who meet the definition of chronic homelessness within our geographic boundaries. When that has been achieved, these beds will be prioritized to those with high service needs, a disability, and have experienced at least 2 years of cumulative lifetime homelessness. Families and individuals with moderate and low service needs are not currently served with these beds.

1. Severe Service Needs, with a disability, with 2 or more years homeless
2. Severe Service Needs with a disability

After everyone in the above groups has been offered housing, TPOCH prioritizes the remaining households as follows:

3. Severe Service Needs, 2 or more years homeless
4. Severe Service Needs
5. High Service Needs, with a disability, with 2 or more years homeless
6. High Service Needs, with a disability
7. High Service Needs, 2 or more years homeless
8. High Service Needs

Timelines for Obtaining Documentation of Chronic Homelessness

Verification of homeless status and disability are required per HUD. Details on what types of homeless verification are provided in this document under Evaluating and Documenting Eligibility (Categories of Homelessness & Required Types of Verification).

Obtaining verification of disability and chronic homeless status shall not be a barrier to entering housing. When projects are verifying chronic homeless status, TPOCH allows projects to require no more than the minimum HUD-required documentation prior to move-in. This includes a review of homelessness with the household to ascertain whether the household qualifies and a primary or secondary source of disability verification. Once the program has enough information from the participant to believe the participant qualifies, s/he should be allowed to move forward with program entry.

The secondary source of disability documentation (social security award letter, handicap parking placard, or written intake worker's notation of a visible disability) allows the program to take up to 45 days to obtain direct third-party disability verification.

Projects are given up to 180 days to obtain written verification of chronic homeless status.

Timelines for Accessing Housing

Programs must make every effort to house participants quickly. Additional barriers may not be imposed and client-centered assistance must be provided to enable participants a quick turnaround from eligibility determination to move-in.

RAPID REHOUSING PROGRAMS

Introduction

Priorities for which eligible families and individuals will receive Rapid Rehousing assistance.

Standards for determining what percentage of income participants may be asked to pay as rent while receiving Rapid Rehousing assistance.

Introduction

Rapid rehousing assistance helps families and individuals who are experiencing homelessness to move as quickly as possible into permanent housing and achieve stability in that housing through a combination of rental assistance and supportive services. Rapid rehousing rental assistance is available for a maximum of 24 months within a three year period; participants may maintain their housing units once the rental assistance has ended by paying full rent to the property. Rapid rehousing uses Fair Market Rates (FMR) established annually by HUD <http://www.huduser.org/portal/datasets/fmr.html>.

Priorities for which families and individuals will receive Rapid Rehousing assistance

Rapid Rehousing programs will use SPDAT tools (through the HMIS per Coordinated Entry) to determine and prioritize who will receive RRH assistance. Households with moderate service needs will be offered rapid rehousing assistance, with priority going to unsheltered households. Families and individuals with low service needs are not currently served with these beds.

Participants must meet the HUD definition of homelessness for Categories 1, 2, or 4. Households must lack sufficient resources and support networks to sustain stability in permanent housing. Rapid Rehousing will be offered on a Housing First basis and re-house households in less than 30 days. Rapid Rehousing utilizes the Transition-In-Place model which allows program participants to retain the unit when the rental assistance and supportive services end.

Standards for determining what percentage or amount of rent each program participant must pay while receiving Rapid Rehousing assistance

The percentage of income each household will pay will increase over time. (NOTE: participants without income will not pay rent; x% of 0 = 0). The rent the participant pays shall not exceed the rental costs on the unit; programs will not profit from participant contributions. Annual earnings are divided by 12 months to calculate a monthly earning amount.

The rent schedule is as follows:

Participants in short-term rental assistance (1-3 months in duration) may pay up to 10% of their income for rent and utilities.

Participants in medium-term rental assistance (4-8 months) may pay up to 25% of their income for rent and utilities.

Participants in long term rental assistance (months 9-24) may pay up to 50% of their income for rent and utilities.

At no point shall the rent collected from the household exceed the lease rent on the property.

TRANSITIONAL HOUSING

Introduction
Community Priorities for those who will receive Transitional Housing
Eligibility
Documentation Protocol for verification of homeless status

Introduction

Transitional Housing (TH) facilitates the movement of homeless families and individuals to permanent housing within 24 months of entering Transitional Housing.

Community Priorities

Transitional Housing programs will use SPDAT tools (through the HMIS per Coordinated Entry) to determine and prioritize who will receive assistance. Households with moderate service needs will be offered assistance; priority going to unsheltered households who are less likely to be able to secure a lease in their own name. Families and individuals with low service needs are not served with these CoC-funded beds.

Eligibility

Participants must meet the HUD definition of homelessness Categories 1, 2 and 4.

Documentation Protocol

Documentation to verify homeless status must be obtained per the Evaluating and Documenting Eligibility (Categories of Homelessness & Required Types of Verification) section of this document.

EVALUATING & DOCUMENTING ELIGIBILITY

HUD further defines homelessness into various categories. This section contains the category definitions and documentation requirements for each level of homelessness. Procedures for evaluating and documenting eligibility are unique to each category of homelessness. HUD has two levels of documentation; Level 2 is only acceptable if level 1 documentation cannot be obtained.

Literally Homeless (also referred to as Category 1)

An individual or family sleeping in an emergency shelter or a Safe Haven (Sonora House), sleeping in a place not meant for human habitation, (staying in someone else's residence does **not** meet the requirements for literal homeless), or exiting an institution where s/he has resided for 90 days or less and was at one of the above places immediately before entering the institution.

Level 1 Options:

- Written observation by the outreach worker
- Written referral by another housing or service provider

Level 2 Options (to be obtained when none of the above are available)

- Certification by the individual or head of household seeking assistance stating that s(he) was living on the streets or in shelter PLUS documentation outlining efforts to obtain both level 1 forms of documentation.

For individuals exiting an institution obtain one of the forms of evidence above for where the person slept prior to entering the institution and one of the following regarding the institution stay:

- Discharge paperwork or written/oral referral
- Written record of intake worker's due diligence to obtain the evidence and certification by individual that they exited institution

At Imminent Risk of Homelessness (also referred to as Category 2)

An individual or family who will imminently lose their primary nighttime residence is considered to be imminently homeless if the residence will be lost within 14 days of the application for homeless assistance, no subsequent residence has been identified and the individual or family lacks the resources or support networks needed to obtain other permanent housing.

Level 1 Options:

- If in housing, a court order resulting from an eviction action notifying the individual or family that they must leave. If in a motel; evidence showing they lack the financial resources to stay.

Level 2 Options consist of three components, all of which must be obtained:

- A documented and verified oral statement with certification that no subsequent residence has been identified
- Self-certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing.
- Documentation outlining efforts to obtain the level 1 documentation.

Homeless under other Federal Statutes (Category 3) This category is available for RHY and ESG programs; Category 3 households are not eligible for COC programs

Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

- i) Are defined as homeless under the other listed federal statutes;
- ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;
- iii) Have experienced persistent instability as measured by two moves or more during the preceding 60 days; and
- iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers.

There are no level 2 sources of documentation for this category, all of the following must be obtained:

- v) Certification by the nonprofit, state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute
- vi) Certification of no permanent housing in the last 60 days
- vii) Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the past 60 days
- viii) Documentation of special needs or two (2) or more barriers

Fleeing/Attempting to flee domestic violence (Category 4)

An individual or family is considered to be fleeing domestic violence when fleeing, or attempting to flee, domestic violence, has no other residence and lacks the resources or support networks to obtain other permanent housing. There are no level 2 sources of documentation for this category.

For victim service providers:

- An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

For non-victim service providers all of the below must be gathered:

- Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker.
- Certification that no subsequent residence has been identified
- Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

Chronically Homelessness

See the key terms section for the definition of Chronic Homelessness.

Projects must document households meeting the HUD criteria for chronic homelessness. This documentation includes three things

- i) Documentation of the current household status as Category 1; Literally Homeless.
- ii) Documentation of disability
- iii) Documentation of the homeless history required to qualify as chronically homeless.

These documents may be obtained after the household has moved in. These documents have levels of documentation as prescribed by HUD. Time spent homeless must be verified; breaks in homelessness do not require third-party verification.

Level 1: Third-Party documentation. This includes written observation by an outreach worker, a written referral by another housing or service provider, or documentation from institutions such as hospitals, correctional facilities, etc. when they include length of stay and are signed by the institution staff. HMIS data may be used in when it contains the information required of all third-party documentation.

Level 2: Self-Certification. This is a signed certification by the individual seeking assistance describing how they meet the definition accompanied with the intake worker's documentation of the living situation and the steps taken to obtain evidence to support this. (A minimum of 5 must be made, and documented, to entities that could provide third-party verification).

Projects are capped at the number of households that can self-certify. A household's documentation packet is considered complete when it verifies disability and third-party verification for at least 9 months of the household's time homeless. 75% of the project's households must have complete documentation packets on file. 25% of the project's households may self-certify all of their time homeless.

REFERENCES

24 CFR 578 HEARTH Act (amending McKinney-Vento Act) and all subsequent amendments

U.S. Department of Housing and Urban Development Notice CPD 16-11: Prioritizing Persons Experiencing Chronic Homeless and Other Vulnerable Homeless Persons in Permanent Supportive Housing.

U.S. Department of Housing and Urban Development Notice CPD 17-01: Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System

